PORSF 11.3,31.3,1
10/19/09

Port of Portland
104(e) Response for Terminal 4 Auto Storage Area

EPA Question	Response	Reference
Section 1.0 - Respondent Information		
1. Provide the full legal, registered name and mailing address of Respondent.	Port of Portland 121 NW Everett Street Portland, Oregon 97209-4049	
2. For each person answering these questions on behalf of Respondent, provide: a. full name; b. title; c. business address; and d. business telephone number, electronic mail address, and FAX machine number.	1. Sara Moore Environmental Project Manager Port of Portland 121 NW Everett Portland, OR 97209 (503) 944-7033 - office (503) 548-5780 - fax sara.moore@portofportland.com 2. Ash Creek Associates Herb Clough, Principal Ashleigh Fines, Senior Staff 9615 SW Allen Boulevard, Suite 106 Portland, Oregon 97005-4814 (503) 924-4704 - office (503) 924-4707 - fax hclough@ashcreekassociates.com afines@ashcreekassociates.com	
3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, please indicate here by providing that individual's name, address, telephone number, fax number, and, if available, electronic mail address.	Jim McKenna Superfund Program Manager Port of Portland 121 NW Everett Portland, OR 97209 (503) 944-7325 - office jim.mckenna@portofportland.com	

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EPA Question	Response	Reference
Section 2.0 - Owner/Operator Information		
4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937-Present). Please note that this question includes any aquatic lands owned or leased by Respondent. a. Currently Owns b. Currently Leases c. Currently Operates d. Historically Has Owned e. Historically Has Leased f. Historically Has Operated	This response addresses certain portions of the Terminal 4 property where the Port is a current and former owner. Terminal 4 is located in the NW ¼ and NE ¼ of Sections 2 and 11, Township 1 North, Range 1 West of the Willamette Meridian, Portland, Multnomah County, Oregon. The Terminal 4 property encompasses approximately 283 acres on the east bank of the Willamette River north of the St. Johns Bridge in North Portland at 11020 and 11040 N. Lombard Street. For the purpose of upland remedial investigation, Terminal 4 is divided into three areas by the Oregon Department of Environmental Quality (DEQ), which are referred to as Slip 1, Slip 3, and the Auto Storage Area. The Terminal 4 Slip 1 and Slip 3 areas are addressed in a separate response that was submitted to EPA on April 30, 2009. This response addresses the Auto Storage Area (T4 ASA) property owned by the Port. Note that there is some overlap with Berth 414 operations. From an operations standpoint, Berth 414 is part of the T4 ASA; however, some discussions of Berth 414 were included in the T4 Slip 1 and Slip 3 response because of its adjacency to the Terminal 4 Slip 3 Upland Facility and the Terminal 4 Removal Action Area. For the purpose of this response and ease of discussion, the T4 ASA is divided into two parcels: • The Lower Parcel consists of approximately 89 acres and is located at the west end of Terminal 4. Port records related to expansions at the Toyota facility divide the Lower Parcel into two distinct areas: the Bench Auxiliary Area and the Toyota Auto Receiving Area. The Bench Auxiliary Area (Bench) is bounded to the north by the property boundary with Union Pacific Railroad (UPRR), to the east by the former Toyota Processing Yard and the property boundary with UPRR, to the south by the property boundary with UPRR, and to the west by UPRR right-of-way. The Toyota Auto Receiving Area is bounded to the north by Terminal 4 Slip 3 Upland Facility, to the east by N. Bradford Street and the Upper Parcel and the UPRR rail corridor, to the south by the former Mar Com North parcel, and to the west by the portion lying below mean high water of the Willamette River. For the purpose of this response, both the Bench and the Toyota Receiving Yard are referred to as the Lower Parcel. • The Upper Parcel consists of approximately 36 acres and is located at the east end of Terminal 4. Port records related to expansions at the Toyota facility divide the Upper Parcel into two distinct areas: the (now former) Toyota Processing Yard and the (now former) Toyota Auto Processing Center. The former Toyota Processing Yard is bounded to the north by UPRR right-of-way and the property boundary with Ray Blackford; to the east by N. Lombard Street; to the south by N. Roberts Avenue; and to the west by UPRR right-of-way and the property boundary with Harvest Homes Inc. The former Toyota Auto Processing Center is bounded to the north by N. Roberts Avenue, to the east by N. Lombard Street, and to the south and west by the UPRR right-of-way and the Bench area. For the purpose of this response, both the former Toyota Processing Yard and the former Toyota Auto Processing Center are referred to as the Upper Parcel. The Port is the current owner of the Lower Parcel and a current and former owner of the Upper Parcel. The Port acquired certain property and improvements within the Lower Parcel from the City of Portland Commission of Public Docks (City CPD) effective January 1, 1971. The Lower Parcel is partially comprised of riverbed filled	See agreements at Tab 1. See deeds and easements at Tab 2. See property transaction records at Tab 5.

EPA Question	Response	Reference
	by the Port and prior owners who had not purchased the filled riverbed from the State. In November 1987, under a property sale and settlement with the Port, the State Land Board, then acting through the Division of State Lands (DSL), quitclaimed to the Port any ownership interests the State had in the Lower Parcel above the line of ordinary high water. The Port acquired the five tax lots (TLs) that comprise the Upper Parcel in phases as follows: a portion of TL 600 (R961021130) in 1970; a portion of TL 1900, the remaining portion of TL 600 (R961021130), and TL 2200 in 1976; TL 500 in 1984; TL 600 (R961020580) in 1985; and the remaining portion of TL 1900 in 1986. The Port sold TL 2200 to 528 Investors LLC in 2005. A summary of the acquisition of the aforementioned tax lots is included in response to Question 5 below. As the owner, the Port engages in property management and general maintenance activities at the T4 ASA property. The Port also has maintenance responsibilities for the berths. Since its acquisition of the property, the Port has entered into leases and other agreements for use of the T4 ASA parcels and berths by entities that are responsible for operations at their lease or use areas. The Port currently holds a lease agreement for use of the T4 ASA with Toyota Motor Sales U.S.A. Inc. (Toyota), who uses the property for parking and processing new vehicles prior to distribution. Toyota is responsible for operations at its leasehold. Toyota also received a 104(e) request from EPA and provides details on its operations in its response. During its ownership of the T4 ASA property, the Port has also held the following submerged land leases adjacent to the Lower Parcel: • In 1982, the Port obtained a lease with DSL (ML-681) for 3.013 acres of submerged land for barge tie-up and storage. The lease with DSL was renewed in 1987 and 1992 and remained in effect until August 31, 1997. • In 1989, the Port obtained a lease with DSL (ML-731) for 1.308 acres of submerged land for barge tie-up and storage. The lease with DSL was renewed in 1992 and remained in effect until August 31, 1997. • In 1999, the Port obtained a lease with DSL (ML-10506) for 3.013 acres of submerged land for barge moorage and staging of equipment and barges. The lease was renewed in 2004, but the leased area was reduced to 2.44 acres. The renewed lease was for spud barge moorage and marine industrial services and was in effect until August 31, 2009. Specific information on current and historical tenants and their respective operations is discussed in response to Question 11.	
5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.	Based upon the Port's EPA-approved schedule dated January 22, 2009, the Port agreed to provide information for nine separate tax lots in the T4 ASA response. During the course of research for the Terminal 4 Slip 1 and Slip 3 response, it was determined that two of the tax lots (R961021200 and R961020390) identified for that response are associated with the T4 ASA Lower Parcel. Those two tax lots are therefore included in this response and are summarized below. The Port is the current owner of certain property and improvements within the T4 ASA property, with the exception of TL 2200 in the Upper Parcel. The address for the Lower Parcel is 11020 N Lombard Street and the address for the Upper Parcel is 10400 N Lombard Street. Details on the tax lots that comprise the two parcels of	See deeds and easements at Tab 2. See property transaction records at Tab 5.

EPA Question	Response	Reference
	the T4 ASA are summarized below: **Lower Parcel** • Tax Lot 100 – Tax Lot ID #1N1W11100; Total Acreage: 2.36; the Port acquired the tax lot in 1971 from the City CPD. The Multnomah County Alternative Tax Lot Identification Number for TL 100 is R961110340. • Tax Lot 101 – Tax Lot ID #1N1W11101; Total Acreage: 6.65; the Port acquired the tax lot in 1971 from the City CPD. The Multnomah County Alternative Tax Lot Identification Number for TL 101 is R961110450. • Tax Lot 301 – Tax Lot ID #1N1W02301; Total Acreage: 6.93; the Port acquired the tax lot in 1971 from the City CPD. The Multnomah County Alternative Tax Lot Identification Number for TL 301 is R961021340. • Tax Lot 800 – Tax Lot ID #1N1W02D800; Total Acreage: 0.03; the Port acquired the tax lot in 1971 from the City CPD. The Multnomah County Alternative Tax Lot Identification Number for TL 800 is R961021200. • Tax Lot 1000 – Tax Lot ID #1N1W02D1000; Total Acreage: 13.00; the Port acquired the tax lot in 1971 from the City CPD. The Multnomah County Alternative Tax Lot Identification Number for TL 1000 is R961020390. • Tax Lot 1001 – Tax Lot ID #1N1W02D1001; Total Acreage: 69.37; the Port acquired the tax lot in 1971 from the City CPD. The Multnomah County Alternative Tax Lot Identification Number for TL 1001 is R961021330. **Upper Parcel** • Tax Lot 500 – Tax Lot ID #1N1W02A500; Total Acreage: 7.77; the Port acquired the tax lot in 1984 from Conqueror's Bible College. The Multnomah County Alternative Tax Lot Identification Number for TL 500 is R961020070. • Tax Lot 600 – Tax Lot ID #1N1W02A600; Total Acreage: 0.96; the Port acquired the tax lot in 1985 from (b) (6) . The Multnomah County Alternative Tax Lot Identification Number for TL 600 is R961020580. • Tax Lot 600 – Tax Lot ID #1N1W02600; Total Acreage: 9.82; the Port acquired the tax lot in 1976 from the Continental Can Company. The Multnomah County Alternative Tax Lot Identification Number for TL 600 is R961021130. • Tax Lot 1900 – Tax Lot ID #1N1W02A1900; Total Acreage: 10.46; the Port acquired portions of the tax lot in 1976 and 1986 from the Continental Can Company and Donald and Jean Waterman, respectively. The Multnomah County Alternative Tax Lot Identification Number for TL 1900 is R961020090. • Tax Lot 2200 – Tax Lot ID #1N1W02A2200; Total Acreage: 6.50; the Port acquired the tax lot in 1976 from the Continental Can Company. The Port sold the Tax Lot to 528 Investors LLC on March 11, 2005. The Multnomah County Alternative Tax Lot Identification Number for TL 2200 is R961021140.	

EPA Question	Response	Reference
	The address for TL 2200 is 10400 N. Lombard. See also response to Question 4 above.	
6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:	See response to 6 (a) through (i) below.	
a. partners or joint venturers;	Not applicable.	
b. any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);	Material handling and disposal of materials associated with Port activities at the T4 ASA property are described further in response to Questions 21, 26, 39 and 64. The contractors associated with those occurrences are as follows: • Clearwater Construction Company • Mike Shough Trucking • MRP • Thermo Fluids • Turner Construction Company Based on review of available records, the following contractors were identified related to Toyota's materials handling activities at the T4 ASA property: • Anderson Environmental • ESPI • Safety Kleen • Spencer Environmental Services, Inc. Toyota received a 104(e) request from EPA and should provide additional details on its material handling in its response.	See other environmental records at Tab 7.
c. any person subleasing land, equipment or space on the Property;	See response to Question 6 (f), (g) and (h).	
d. utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;	The following utilities and easements were identified at the T4 ASA property: **<u>Railroads</u>** • OWR&N and UPRR were granted an easement to construct, maintain, repair and replace trackage for the purpose of draining surface waters at the Lower Parcel in 1952. In 1977, the two companies entered into an agreement with the Port to construct, maintain and use a private roadway at the T4 ASA property and had the right to construct, maintain, and use the area between the rails of tracks and the right of way. In 1984, the Port granted OWR&N and their lessee, UPRR, permission to connect into the Port's power line for electrical access for flashing light signals. In 1988, the railroads granted an easement to the Port to	See agreements and contracts at Tab 1. See deeds and easements at Tab 2. See property transaction records at Tab 5.

EPA Question	Response	Reference
	install and maintain an access road and necessary lighting installations. • UPRR was granted an easement in 2004 to construct, maintain and operate industrial rail trackage at the T4 ASA property. • OWR&N was granted an easement in 1981 for the construction, maintenance, repair, renew, and use of a standard gauge railroad track. **Utilities** • 528 Investors was granted a utility easement on March 15, 2005 for the purposes of reconstruction, repair, operation, use, and maintenance of a storm sewer line, a water line and a sanitary sewer line. Also in 2005, 528 Investors executed a Storm Water Use Agreement with the Port that allowed the discharge of stormwater into the Port's system. • The City of Portland was granted a ten-foot wide sewer easement sewer at the Upper Parcel in 1948 and at Tax Lot 100 on the Lower Parcel in 1971. Also in 1971, the City was granted an easement at the Lower Parcel for the section of its stormwater system (Outfall 53) that traverses TL 1001 (referenced as the Reno Street Outfall at that time). In 1976, the City was granted an easement for the right to lay down, construct and perpetually maintain a water main and service vault. In 1987, the City was granted an easement for sections of its stormwater system (Outfall 52C) that traverse TL 500 at the Upper Parcel. • Northwest Natural Gas Company was granted an easement in March 2005 for access to its natural gas pipeline, and for aboveground locate wires or other required regulating equipment or facilities. • Pacific Northwest Bell Telephone (now Qwest) was granted permits in 1975 and 1976 to make structural or nonstructural alterations to its cable at Berth 416. • Portland General Electric (PGE) was granted an easement in 1958 for electrical transmission lines at the Upper Parcel. PGE was granted an easement in March 2005 for its underground electrical power transmission lines and signal or communications lines. • Qwest Corporation was granted an easement in February 2005 for its aerial and underground telecommunication facilities. **Other Easements** • Toyota was granted an easement in August 2004 for vehicle access for Roadways A and B. • 528 Investors, LLC was granted an easement for joint access to adjacent driveways along N. Lombard Street in April 2008.	
e. major financiers and lenders;	Not applicable.	
f. any person who exercised actual control over any activities or operations on the Property; g any person who held significant authority to control any activities or operations on the Property; h any person who had a significant presence or who conducted significant activities at the Property; and	The Port is a current and former owner of the T4 ASA property. The following entities held leases, subleases, permits and rights-of-entry, or utilized yard space or the dock/warehouse facilities, exercised or had the authority to exercise control over the activities and operations, and/or had a significant presence or conducted significant activities during the Port's ownership. Note that time periods of involvement could be more expansive; dates are based on best available information at this time. 1. 528 Investors, LLC (2005-present) 2. Brady Hamilton Stevedore Company (1971)	

EPA Question	Response	Reference
	3. Brix Maritime Company (dba Foss Maritime Co.) (1992-1997) 4. CHEMCENTRAL Corporation (now Univar USA Inc.) (2002-2007) 5. City of Portland (1966-present) 6. Columbia Warehouse (at least 1976) 7. Convoy Company (at least 1976) 8. Curious Pictures Corporation (1999) 9. International Longshore and Warehouse Union Local 40 (at least 1976) 10. Kerry Log & Rafting (1964-1968) 11. Knappton Corporation (1979-1987) 12. Oregon Steel Mills (now Evraz Oregon Steel Mills (EOSM) (1998-2001) 13. Oregon Terminal Company (1988-1997) 14. Oregon-Washington Railroad & Navigation Company (OWR&N Co.) (1952-present) 15. Pacific Inland Navigation Company (aka Art Raz) (1983) 16. Pacific Northwest Bell (1975 & 1976) 17. Port Services Company (1970 and at least 1976) 18. Portland General Electric (dba Portland General Distribution Services) (2004) 19. Portland Shipping Club (1999) 20. Power Barge Corporation (2008) 21. Toyota Motor Sales, Inc. & Toyota Logistics Services, Inc. (1972-present) 22. Union Pacific Railroad (1952-present) 23. Wetserve, Inc. (1995) See also response to Question 11 below.	
i. government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.	During the Port's ownership of the T4 ASA property, the following government entities had interest or involvement: City of Portland (1942-present) Multnomah County (at least 1944 & 1950-1953) State Land Board (DSL) (1859-1987) U.S. Government (1944-1950)	See DSL Settlement and Mutual Release at Tab 1 of the Port's 104(e) response for Terminal 1 South, submitted to EPA and dated August 16, 2008.
7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest: when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).	The Port is a current and former owner of the Terminal 4 ASA property. **Lower Parcel** The Port acquired certain property and improvements within what is now the T4 ASA Lower Parcel from the City of Portland Commission of Public Docks (City CPD) effective January 1, 1971 and acquired certain filled lands from the State Land Board under the 1987 Settlement with DSL. **Upper Parcel** The Port acquired certain property and improvements within what is now the T4 ASA Upper Parcel from	See CPD bargain and sale deed at Tab 2 of the Port's 104(e) response for Terminal 1 North, submitted to EPA on July 16, 2008. See DSL Settlement and Mutual Release at Tab 1 of the Port's 104(e) response for Terminal 1 South, submitted to EPA and dated August 16, 2008.

EPA Question	Response	Reference
	various private entities between 1970 and 1986. In 1986, the Port deeded a portion of the Upper Parcel to the City of Portland for street purposes. The Port sold TL 2200 to 528 Investors LLC in 2005. See also the response to Questions 4 and 5 above.	
8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.	Not to the Port's knowledge.	
9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.	The acquisition of the Lower Parcel was performed pursuant to State legislation, a vote by the citizens of Multnomah, Clackamas and Washington Counties, a City of Portland Ordinance, and action by the Port Commission, based on the determination that it was in the best interest of the people to consolidate public dock ownership within one government entity, from the City to the Port. The historical documents relating to the Port's acquisition of the T4 ASA property from the City CPD and other associated landowners identified in the response to Question 10 below do not indicate the Port had prior knowledge or reason to know that any hazardous substance, waste, or material was disposed of on, or at the property.	
10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above including, but not limited to, the following entities believed to have owned one or more of your Properties: a. City of Portland b. Freightliner LLC c. Oregon Shipbuilding Corporation d. Shipyard Commerce Center LLC e. Union Pacific Railroad; and f. West Coast Terminal Company For each prior owner, further identify, if known and if relevant, and provide copies of any documents you may have regarding: i. the dates of ownership ii. all evidence showing that they controlled access to the Property; and iii. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they	Of the entities listed in (a) through (f) of Question 10, the City of Portland and Oregon Shipbuilding Corporation are known to have been prior owners of the T4 ASA property, as described below. Based on review of available records, prior owners of the T4 ASA property include: **Lower Parcel** • City of Portland (prior to 1927 to at least 1944) • City of Portland CPD (1966 to 1971) • (b) (6) (1959 to 1968) • Investors Associated, Inc. (at least 1949 to 1966) • Multnomah County (at least 1944) • (b) (6) (unknown to 1927 to ~1944) • State of Oregon, Department of State Lands (1859-1987) • (b) (6) (~1944 to unknown) • Weyerhaeuser Timber Company (prior to 1927 to at least 1944) **Upper Parcel** • Conqueror's Bible College (1965 to 1984) • Continental Can Company (unknown to 1976)	See agreements at Tab 1. See deeds and easements at Tab 2. See property transaction records at Tab 5.

EPA Question	Response	Reference
owned the Property.	• (b) (6) (unknown to 1985) • (b) (6) (unknown to 1953) • Multnomah County School District (1950 to 1953) • Northwestern District of the United Pentecostal Church (1953 to 1965) • Oregon Shipbuilding Corporation (unknown to 1944) • Port of Portland (1976 to 2005) • Waterman, Donald and Jean (1954 to 1986) • U.S. Government (1944 to 1950) Periods of ownership are reflected by the available deeds which are included in Tab 2.	
11. Identify all current or prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above including, but not limited to, the following entities: a. Beall Pipe, Inc.; b. Benson Industries, Inc.; c. Cargill, Inc.; d. Cascade General; e. Cascade West; f. Chevron USA; g. Classical Chinese Garden Trust; h. Hunt Foods, Inc.; i. Kaiser; j. Multnomah County Sheriff's Office; k. Pacific Molasses Company; l. Pacific Pine; m. Port of Cascade Locks.; n. Portland Municipal Airport; o. Safety Kleen; p. Shaver Transportation Company; q. Speed Towing; r. St. John Auto Wrecking Yard; s. Thermo Pressed Laminates, Inc.; t. Tristar Transload, Inc.; u. U.S. Maritime Commission; v. Ultraboard; w. War Assets Administration; x. West Coast Paper Company; y. Western Transportation.; and z. Willamette Iron and Steel Corporation. For each such operator, further identify, if known and if relevant, and provide copies of any documents you may have regarding: i. the dates of operation;	Of the entities listed in (a) through (z) of Question 11, only St. John's Auto Wrecking Yard is known to have been a prior operator of the T4 ASA property, as explained below. Note that time periods of involvement could be more expansive; dates are based on best available information at this time. **1. 528 Investors, LLC** i. 2005 to present ii. Current owner of Tax Lot 2200 of the Upper Parcel. In 2004, the Port executed a purchase and sale agreement with Phase One Equities for TL 2200. In 2005, Phase One Equities assigned its rights under the agreement to 528 Investors, who subsequently acquired the tax lot. It is the Port's understanding 528 Investors leases its property to Ifco Systems, who operates a pallet management business at the site. In March 2005, 528 Investors was granted a utility easement for the purposes of reconstruction, repair, operation, use, and maintenance of a storm sewer line, a water line and a sanitary sewer line. Also in 2005, 528 Investors executed a Storm Water Use Agreement with the Port that allowed the discharge of stormwater into the Port's system. Lastly, 528 Investors was granted an easement for joint access to adjacent driveways along N. Lombard Street in April 2008. iii. Port property files iv. No documented evidence of releases was identified. **2. Brady Hamilton Stevedore Company** i. 1971 ii. Held a month-to-month lease agreement to use a portion of Auto Services Building on the Lower Parcel as a gearlocker. iii. Port property files iv. No documented evidence of releases was identified. **3. Brix Maritime Company (dba Foss Maritime Company)** i. 1992 to 1997 ii. Under the Port's leases with DSL (ML-681, ML-731 and ML-10506), Brix/Foss subleased waterfront, moorage space, and dolphins adjacent to the Lower Parcel for barge moorage. As part of the sublease agreement, Foss agreed to remove the dolphins once the structures were not actively in use. Prior to the August 31, 2009 DSL lease expiration, Foss notified the Port of their decision not to renew the sublease and subsequently obtained Removal Permit #42939 from DSL and the U.S. Army Corps of Engineers for	See agreements at Tab 1. See deeds and easements at Tab 2. See property transaction records at Tab 5. See site investigation records at Tab 6. See other environmental records at Tab 7.

EPA Question	Response	Reference
ii. the nature of prior operations at the property; iii. all evidence that they controlled access to the property; and iv. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they operated on the Property.	the removal of the dolphins. iii. Port property files iv. No documented evidence of releases was identified. **4. CHEMCENTRAL (now Univar USA, Inc.)** i. 2002 to 2007 ii. Held a permit and right-of-entry to install a groundwater monitoring well on the northeastern portion of the Upper Parcel. iii. Port property files iv. CHEMCENTRAL is conducting a remedial investigation (RI) of its facility with oversight from DEQ. During the RI process, CHEMCENTRAL installed groundwater monitoring wells at its facility and the adjacent Borden Chemical property, both of which are proximal to the Upper Parcel. In May 1991, chlorinated VOCs were detected in groundwater under the Borden Chemical property. In early 2003, CHEMCENTRAL installed additional monitoring wells to delineate the extent of groundwater contamination and determine if contaminants had migrated further than the CHEMCENTRAL facility and Borden Chemical property. One well, MW-8, was installed on the east side of the Upper Parcel at that time. Groundwater monitoring was performed in April 2003 and April 2004. Analytical results from the April 2003 monitoring event indicate tetrachloroethene (PCE) was detected in MW-8 at 1.6 µg/L; however, results from follow-up sampling in April 2004 indicate chlorinated VOCs were non-detect. According to the RI report, relatively higher concentrations of chlorinated VOCs are present in groundwater beneath the CHEMCENTRAL building and the concentrations decrease going away from the structure. Since the PCE concentration in MW-8 was below applicable action levels, the RI concluded it did not pose unacceptable risk for the Upper Parcel. In addition, Toyota's consultant, EAI, performed groundwater monitoring in 2002 and no chlorinated VOCs were detected in any of the T4 ASA wells at that time. **5. City of Portland** i. & ii. Owned and operated the Lower Parcel from 1966 to 1971. Activities that occurred on the Lower Parcel during City CPD ownership included land development and leasing areas to tenants. The City of Portland was granted a ten-foot wide sewer easement at the Upper Parcel in 1948 and at the Lower Parcel at TL 100 in 1971. In 1966, Investors Associated, Inc. assigned its lease with Kerry Log & Rafting Company to the City CPD. In July 1969, the City CPD applied for a permit from the U.S. Army Corps of Engineers to dredge at River Mile 5.4 to 5.5 and place the material upland at its adjacent property (the Lower Parcel). In 1971, the City was granted an easement at the Lower Parcel for the section of its stormwater system (Outfall 53) that traverses TL 1001 (referenced as the Reno Street Outfall at that time). In 1976, the City was granted an easement for the right to lay down, construct and perpetually maintain a water main and service vault. In 1986, the Port and the City entered into a joint agreement to construct a storm sewer system for N. Lombard Street, N. Roberts Avenue and adjacent properties associated with the Upper Parcel. In 1986, the Port deeded a portion of the Upper Parcel to the City for street purposes. In 1987, the City was granted an easement for sections of its stormwater system (Outfall 52C) that traverse TL 500 at the Upper Parcel. iii. Port property files iv. No documented evidence of releases was identified. **6.** (b) (6)	

EPA Question	Response	Reference
	i. 1959 to 1968 ii. Prior owner of the Lower Parcel; operations unknown. iii. Port property files iv. No documented evidence of releases was identified. **7. Columbia Warehouse** i. At least 1976 ii. Subcontracted with Toyota; operations at the Upper Parcel included cleaning and repairing damaged automobiles. No additional information was available. iii. Port property transaction files iv. No documented evidence of releases was identified. **8. Continental Group, Inc., (formerly Continental Can Company, Inc.)** i. 1935 to 1976 ii. Prior owner of the Upper Parcel; manufactured custom and specialty cans. In 1976, Continental Can Company granted a permit and right-of-entry to the Port for the purpose of soil testing, clearing, grading, and paving in connection with the Port's redevelopment of the property. iii. Property transaction records iv. No documented evidence of releases was identified. **9. Conqueror's Bible College** i. 1956 to 1984 ii. Prior owner of the Upper Parcel; operated an academic institution. iii. Port property files iv. In March 1985, four USTs were removed from the area of the college building. Records indicate the one UST may have contained diesel or heating oil. Contents of the remaining three USTs are unknown. Three of the USTs were near a utility building northwest of the main building (ranging in size from 3,600 to 5,600 gallons), and one 2,500-gallon UST was located near the main building entrance. A permit for the 2,500-gallon UST was issued in September 1943 (per a Fire Marshal record). Port personnel who observed the UST removals indicated that no impacted soil was encountered during the UST excavations. **10. Convoy Company** i. At least 1976 ii. Subcontracted with Toyota; loaded automobiles either directly from ship or the vehicle storage area following processing for overland distribution. iii. Property transaction records iv. No documented evidence of releases was identified. **11. Curious Pictures Corporations** i. 1999 ii. Held a permit and right-of-entry to film a commercial at Berth 408 (at T4 Slip 3) and to use Warehouse 6 as a back-up area. iii. Property transaction records iv. No documented evidence of releases was identified. **12.** (b) (6) i. Unknown to 1985 ii. Prior owner of the Upper Parcel; operations unknown.	

EPA Question	Response	Reference
	iii. Property transaction records iv. No documented evidence of releases was identified. **13. International Longshore and Warehouse Union (ILWU) Local 40** i. At least 1976 ii. Under contract with the Port, drove automobiles from calling vessels to the Toyota storage area. iii. Property transaction records. iv. No documented evidence of releases was identified. **14. Investors Associated, Inc. (aka Commonwealth, Inc.)** i. At least 1949 to 1966 ii. Prior owner of the Lower Parcel; operations unknown. In November 1949, Investors Associated, Inc. issued a Permit for Spoil Disposal Area to the War Department and the U.S. Army Corps of Engineers. The permit indicates shore work would be performed by the Port. In 1964, Investors Associated entered into a lease agreement with Kerry Log & Rafting Company for use of dolphins and mooring log and timber rafts adjacent to the Lower Parcel. In 1966, Investors Associated assigned its lease with Kerry Log & Rafting Company to the City CPD. Correspondence from 1966 indicates that in 1959, Investors Associated authorized the Port to place dredged material on its property for a period of three years. iii. Port property files iv. No documented evidence of releases was identified. **15. Kerry Log & Rafting** i. 1964 to 1968 ii. Held a lease agreement with Investors Associated, and later with the City CPD, for the use of dolphins for the purpose of mooring log and timber rafts adjacent to the Lower Parcel. iii. Port property files iv. No documented evidence of releases was identified. **16. Knappton Corporation** i. 1979 to 1987 ii. Under the Port's lease with DSL (ML-681), Knappton subleased 2.5 acres of waterfront and 6 existing dolphins adjacent to the Lower Parcel for barge moorage. iii. Port property files. iv. No documented evidence of releases was identified. **17. Multnomah County** i. At least 1944 ii. Prior owner of the Lower Parcel; operations unknown. iii. Port property files iv. No documented evidence of releases was identified. **18. Multnomah County School District** i. 1950 to 1953 ii. Prior owner of the Upper Parcel; operations unknown. iii. Port property files iv. No documented evidence of releases was identified. **19. Northwest Natural Gas Company** i. 2005 to Present ii. Northwest Natural Gas Company was granted an easement in March 2005 for construction, installation,	

EPA Question	Response	Reference
	operation, maintenance, replacement, reconstruction, and removal of a natural gas pipeline, and for any necessary aboveground locate wires or other required regulating equipment or facilities. iii. Port property files iv. No documented evidence of releases was identified. **20. Oregon Ship School** i. 1952 ii. Operations unknown. iii. City directories iv. No documented evidence of releases was identified. **21. Oregon Shipbuilding Corporation** i. Unknown to 1944 ii. Prior owner of the Upper Parcel; records indicate a day care facility was operated on the property from 1940 until 1948. iii. Port property files iv. No documented evidence of releases was identified. **22. Oregon Steel Mills (now Evraz Oregon Steel Mills (EOSM))** i. At least 1998 to 2001 ii. EOSM held a terminal use agreement with the Port for importing and exporting its steel products. The agreement included preferential use of approximately 20 acres of paved area adjacent to the dock, Warehouse 7, preferential use of Berth 415, and non-preferential use of Berth 414. iii. Port lease records iv. No documented evidence of releases was identified. **23. Oregon Terminal Company** i. 1988-1997 ii. Under a management agreement in 1988, Oregon Terminal Company (OTC) took over certain operations at the Lower Parcel, which included Warehouses 6 and 7, and the steel yard area. iii. Property transaction records iv. No documented evidence of releases was identified. **24. Oregon-Washington Railroad & Navigation Company (OWR&N)** i. 1952 to Present ii. OWR&N and UPRR were granted an easement to construct, maintain, repair and replace trackage for the purpose of draining surface waters at the Lower Parcel in 1952. In 1977, the two companies entered into an agreement with the Port to construct, maintain and use a private roadway at the T4 ASA property and had the right to construct, maintain, and use the area between the rails of tracks and the right of way. In 1981, OWR&N was granted an easement to construct, maintain, repair, renew, and use a standard gauge railroad track upon and across the property. In 1984, the Port granted OWR&N and their lessee, UPRR, permission to connect into the Port's power line for electrical access for flashing light signals. In 1988, the railroads granted an easement to the Port to install and maintain an access road and necessary lighting installations. iii. Port property files iv. No documented evidence of releases was identified. **25. Pacific Inland Navigation Company (aka Art Raz)** i. 1983	

EPA Question	Response	Reference
	ii. Use of dolphins adjacent to the Lower Parcel for temporary barge moorage. iii. Port property transaction records iv. No documented evidence of releases was identified. **26. Pacific Northwest Bell (now Qwest)** i. 1975 and 1976 ii. Pacific Northwest Bell Telephone was granted permits in 1975 and 1976 to make structural or nonstructural alterations to its cable at Berth 416. iii. Port property transaction records iv. No documented evidence of releases was identified. **27. Phase One Equities** i. 2004 ii. Phase One Equities executed a purchase and sale agreement with the Port in 2004 to acquire TL 2200. In 2005, Phase One Equities assigned its right under the agreement to 528 Investors, LLC. iii. Port property files iv. No documented evidence of releases was identified. **28. Port Services Company** i. 1970 and at least 1976 ii. Held a lease agreement with the City CPD in 1970 for approximately 2.54 acres and constructed a warehouse for its operations on the Lower Parcel. At that time, Port Services Company operations included automobile cleaning, undercoating, and "get-ready services". In at least 1976, Port Services Company operated at the Upper Parcel under a subcontract with Toyota for cleaning and repair of automobiles. No additional information was available. iii. Port property transaction records iv. No documented evidence of releases was identified. **29. Portland Shipping Club** i. 1999. ii. Held a permit and right-of-entry for the purpose of holding the club's annual "clam feed" event. iii. Port property transaction records iv. No documented evidence of releases was identified. **30. Portland General Electric (also dba Portland General Distribution Services)** i. 1958 to present ii. PGE was granted an easement in 1958 for electrical transmission lines at the Upper Parcel. In 2004, the Port granted a permit and right-of-entry to Portland General Distribution Services for the purpose of removing old and installing new utility poles for the Toyota redevelopment on the Lower Parcel. PGE was also granted an easement in March 2005 for construction, maintenance, repair, rebuilding, operation and patrol of underground electrical power transmission lines and signal or communications lines. iii. Port property files iv. No documented evidence of releases was identified. **31. Power Barge Corporation** i. July 1, 2008 ii. Held a dockage agreement for the preferential right to use Berth 416 adjacent to the Lower Parcel to berth a barge or other vessel. iii. Port property files	

EPA Question	Response	Reference
	iv. No documented evidence of releases was identified. **32. Qwest** i. 2005 to Present ii. Qwest Corporation was granted an easement in February 2005 to install, operate, maintain and remove aerial and underground telecommunication facilities for the exclusive use of the Port or the Port's tenants. iii. Port property files iv. No documented evidence of releases was identified. **33. St. Johns Auto Wrecking (aka St. Johns Auto Parts and Waterman Auto Wrecking Yard)** i. 1949 to 1986 ii. Prior operator who used TL 1900 at the Upper Parcel in connection with its automobile parts business and wrecking yard. Available records indicate St. Johns Auto Parts executed a lease agreement with Donald Waterman in 1976. No additional information was available. iii. Port deeds and property records. iv. During the course of an environmental investigation of the St. John's Auto Wrecking Yard in June 1986, Bright and Associates (B&A) observed oily water being discharged directly to the ground during steam cleaning operations at the facility. B&A also observed oil staining on the ground. Materials stored at the facility at the time of the investigation included drums of solvent, thinner, and gasoline. One waste oil UST was present and a second UST was suspected to be present near the waste oil UST. Following the investigation, B&A hired Dames and Moore to conduct sampling to evaluate subsurface conditions at the former wrecking yard, which included completion of 26 shallow soil borings and installation of two groundwater monitoring wells. Analytical reports indicate total petroleum hydrocarbons (TPH) were detected in three of the soil samples. In July 1986, during site preparation for the expansion of the Toyota facility, Clearwater Construction Company removed two USTs from the former wrecking yard and approximately 828 cubic yards (cy) of oil-contaminated soil. An additional 48 cy of soil contaminated with battery acid was neutralized with lime prior to disposal at the St. Johns Landfill. Port records suggest additional USTs were removed from the former wrecking yard and adjacent residences, but this information could not be confirmed. DEQ issued a No Further Action (NFA) Letter to TLS on September 17, 2003 regarding two UST releases identified during their operation of the Upper Parcel. Remedial work associated with the St. Johns Auto Wrecking Yard was included in that NFA. **34. Toyota Motor Sales, U.S.A Inc. (Toyota) and Toyota Logistics Services, Inc. (TLS) (aka Vehicle Processors, Inc. and Toyota Vehicle Processors, Inc.)** i. 1972 to Present ii. Since 1972, Toyota has held a lease agreement with the Port for use of the Lower Parcel (and later, the Upper Parcel) in association with its vehicle import operations. New automobiles transported by ship from Japan or by rail from Toyota's U.S. plants are received at the facility and prepared for distribution to dealers. As such, Toyota's agreements have allowed for berthing vessels, unloading automobiles, use of receiving, rail, and service areas for processing vehicles, operation of floating auto docks, ramps, and roadways, and use of offices and the lunchroom building.	

EPA Question	Response	Reference
	Toyota Logistics Services (TLS) is responsible for receiving and processing vehicles imported into the facility. TLS operations include, but were not limited to, fueling vehicles, installing accessories, removing and applying protective coatings, repairing minor vehicle damage, vehicle washing, conducting final inspections, and loading vehicles onto trucks and railcars for distribution to dealers. TLS also performed routine maintenance on company-owned/fleet vehicles. These operations were conducted at the Upper Parcel from 1976 until 2004 when processing operations were relocated to the Lower Parcel. In 2002, Toyota's renewed lease with the Port included initial construction and redevelopment of the facility. As stated above, redevelopment of the facility included relocating vehicle processing operations from the Upper Parcel to the Lower Parcel. Operations added to the Lower Parcel include distribution of vehicles and their parts, fueling vehicles; installing accessories, repairing damaged vehicles; washing the vehicles (with a closed loop water recovery system or sanitary discharge), and distribution. iii. Port property files. iv. As part of its operations, TLS historically utilized 13 USTs. In 1984, a small hole was identified in UST #4 at the Toyota Auto Processing Center. The UST was used to store "Van Fuel" (a product similar to kerosene used for coating removal) and was subsequently abandoned in place by filling the tank with sand. No further information was identified regarding the 1984 leak. In 1986, a release of approximately 3,000 gallons of Van Fuel occurred at the Toyota Auto Processing Center. The release occurred when TLS attempted to fill the previously abandoned UST #4 with Van Fuel. In March 1991, following the removal of six 20,000-gallon USTs and one 10,000-gallon UST and the observation of soil contamination, the ASA property was placed on DEQ's Leaking Underground Storage Tank (LUST) list. Following adequate investigation and cleanup activities, DEQ issued a No Further Action (NFA) determination to TLS on September 17, 2003. See response to Questions 13(j) and 71 below. On February 1, 2006, one of Toyota's oil/water separators on the Lower Parcel that had reached its oil storage capacity overflowed during a heavy rain event. As a result, the oil bypassed the separator and drained oily sludge into one of the bioswales located at the Lower Parcel. Toyota subsequently had the oil/water separator pumped out and approximately 500 gallons were removed. The volume released into the swale was estimated to be around two gallons. On July 7, 2007, approximately one gallon of antifreeze was released from the radiator of a vehicle at Berth 415. The antifreeze was cleaned up by the operator of the vehicle and did not reach any storm drains. It is the Port's understanding that TLS used and stored hazardous and non-hazardous materials as part of its operations. A summary of those materials and locations identified prior to TLS vacating the Upper Parcel is documented in the Preliminary Environmental Site Assessment and Exit Audit (PESA) included in Tab 5. Toyota received a 104(e) request from EPA and should provide details on its past and present	

EPA Question	Response	Reference
	handling, use, storage, and disposal of hazardous substances, pollutants and contaminants in its response. **35. Union Pacific Railroad (UPRR)** i. 1952 to Present ii. In 1952, UPRR and OWR&N were granted an easement to construct, maintain, repair and replace trackage for the purpose of draining surface waters. In 1977, the two companies entered into an agreement with the Port to construct, maintain and use a private roadway at the T4 ASA property and had the right to construct, maintain, and use the area between the rails of tracks and the right of way. In 1981, the railroads were granted an easement to construct, maintain, repair, renew, and use a standard gauge railroad track upon and across the property. In 1984, the Port granted OWR&N and their lessee, UPRR, permission to connect into the Port's power line for electrical access for flashing light signals. In 1988, the railroads granted an easement to the Port to install and maintain an access road and necessary lighting installations. In 1997 and 1999, UPRR was granted a permit and right-of-entry for the use the Berth 414 and 415 yard area to conduct defensive driver training. In 2000, Union Pacific Railroad Police was granted a permit and right-of-entry to conduct defensive driver training for its employees between former Warehouses 6 and 7. iii. Port property files iv. No documented evidence of releases was identified as it relates to these activities; for information regarding releases associated with the adjacent UPRR St. Johns Tank Farm, see the Port's 104(e) response for Terminal 4 Slip 1 and Slip 3 that was submitted to EPA on April 30, 2009. **36. Northwestern District of the United Pentecostal Church** i. 1953 to 1965 ii. Prior property owner; operations unknown. iii. Port property files iv. No documented evidence of releases was identified. **37. United States Government** i. 1944 to at least 1953 ii. Prior owner of a portion of the Upper Parcel (TL 500). Records reviewed for this response indicate that, during the WWII era, a daycare facility and barracks were historically located on TL 500 and TL 114 (which now encompasses TL 600 (R961021130), TL 2200, and the very southern portion of TL 1900), respectively. During WWII, the U.S. had proximal operations at the Oregon Shipbuilding Corporation (OSB) yard (now Schnitzer) and Terminal 4 (where the U.S. leased the terminal from the City CPD for the Army Transport Service's Sub-Port of Embarkation to the Seattle District). The barracks were likely used in association with OSB workers and/or servicemen stationed at Terminal 4. The day care facility, which was in operation until 1948, was presumably for children of shipyard workers at OSB. In addition, the United States placed a covenant on TL 500 at the Upper Parcel in 1950. The covenant stated the U.S. could take unrestricted possession of the property should a national emergency be declared and required payment of a fair rental. The covenant was modified in 1953. No additional information was available. iii. Port property records iv. No documented evidence of releases was identified. **38. Waterman, Donald and Jean** i. 1952 to 1986 ii. Prior owners of the auto wrecking yard property. Available records indicate Donald Waterman held a	

EPA Question	Response	Reference
	lease agreement with St. Johns Auto Parts in at least 1976. iii. Port deeds and property records. iv. See discussion of St. Johns Auto Wrecking above. **39. Wetserve, Inc.** i. 1995 ii. Prior operator at Toyota vehicle processing facility; operations unknown. iii. City directories iv. No documented evidence of releases was identified.	
12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.	Specific information on aquatic and submerged land leases is discussed in response to Question 4 above.	See agreements at Tab 1. See property transaction records at Tab 5.
Section 3.0 - Description of Each Property		
13. Provide the following information about each Property identified in response to Question 4:	See response to bullets (a) through (m) below.	
a. property boundaries, including a written legal description;	A legal description of the tax lots comprising the T4 ASA property is included in the deeds for the property, which are located at Tab 2.	See deeds and easements at Tab 2. See drawings and maps at Tab 3.
b. location of underground utilities (telephone, electrical, sewer, water main, etc.);	Since the Port acquired the Upper and Lower parcels, the property has been served by the following utilities: • City of Portland (water and sewer) • Northwest Natural (natural gas) • Portland General Electric (electricity) • Pacific Northwest Bell Telephone (now Qwest) (telephone) See response to Question 6 (d) for utility easement information.	See drawings and maps at Tab 3. See property transaction records at Tab 5.
c. location of all underground pipelines whether or not owned, controlled or operated by you;	Underground pipelines associated with water lines, sanitary sewer and storm systems are described in response to Question 13 (b) above and Question 13 (i) below and contained in drawings and maps at Tab 3. It is the Port's understanding that the Toyota leasehold contains underground piping that connects a 12,000-gallon double-walled AST in the fuel area to a fuel island covered by a canopy at the Lower Parcel. Toyota received a 104(e) request from EPA and should provide details on its underground pipelines in its response.	See drawings and maps at Tab 3.
d. surface structures (e.g., buildings, tanks, pipelines, etc.);	The T4 ASA Lower Parcel is currently developed with the Toyota Logistics Services Auto Receiving Area. The Toyota facility is currently developed with the following structures: • Offices	See drawings and maps at Tab 3.

EPA Question	Response	Reference
	• Breakroom • Parts Storage Area • Two Accessory Installation Area • Fuel Tank Area – consisting of two 12,000 gallon ASTs connected to a fuel island • Body Shop/Maintenance/Mechanic Building • Car Wash Building • Final Quality Assurance Building • Guard Shack Toyota received a 104(e) request from EPA and should provide details on its surface structures in its response. There are no structures present on the Upper Parcel; it consists of asphalt-concrete pavement and is used by Toyota for parking new automobiles. The Port sold a portion of the Upper Parcel (TL 2200) to 528 Investors LLC in 2005. As such, the Port is not familiar with the current configuration of surface structures at that location. A detailed history of the construction and removal of surface structures at the T4 ASA parcels is included in response to Question 13(k).	
e. over-water structures (e.g., piers, docks, cranes, etc.);	Currently, the only over-water structures at the T4 ASA are adjacent to the Lower Parcel and include three berths (Berths 414, 415, and 416). The berths are located on the river side of the Lower Parcel, southeast of Terminal 4 Slip 3. Berth 416 is a floating dock. There are no over-water structures at the Upper Parcel as it is not river-adjacent. A detailed history of over-water structure construction and removal is included in response to Question 13 (k).	See drawings and maps at Tab 3.
f. dry wells;	No known drywells currently exist or existed historically at the T4 ASA property.	
g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);	As discussed in Question 13(j) below, USTs associated with the Upper Parcel have been sources for remediation efforts conducted by Toyota. Treatment systems associated with those remediation efforts are discussed below. **<u>Upper Parcel</u>** In September 1986, Toyota contracted with Bright & Associates to install and implement an in-situ bioremediation system consisting of injection of naturally occurring bacteria (specially formulated to degrade Van Fuel-type contaminants), hydrogen peroxide, and nutrients to remediate vadose zone contamination resulting from past leakage of Van Fuel from USTs located adjacent to Toyota's carwash facility. The system was augmented in 1988 and then terminated in 1990 due to concerns that it could be accelerating the downward migration of petroleum contamination. In March 1991, Environmental Audit, Inc. (EAI) was retained by Toyota to remove six 20,000-gallon USTs and one 10,000-gallon UST from their leasehold. At the time of removal, six of the seven USTs contained car wash	See drawings and maps at Tab 3. See property transaction records at Tab 5. See site investigation records at Tab 6.

EPA Question	Response	Reference
	water. Samples of the car wash water were collected and submitted for TPH analysis. Only the samples from one UST contained elevated concentrations of TPH. Based on elevated concentrations of TPH, the water was pumped to a 20,000 AST for temporary storage and an activated granular carbon treatment system was installed to treat the water contained in the AST prior to discharge. In January 1993, on behalf of Toyota, EAI implemented a soil vapor extraction system (VES) to treat a 3,000-gallon release of Van Fuel from an abandoned-in-place UST. Areas impacted from subsequent releases that were ultimately connected to the VES are summarized below: • In September 1994, free product was detected in a monitoring well located northwest of the car wash USTs. This well was hooked up to the vapor extraction system in late 1995 to mitigate hydrocarbons in the subsurface. • In 1995, the two USTs from the westernmost fuel island were removed. Gasoline-impacted soil was encountered during the removal. Seven soil borings were completed in and around the UST excavation area to evaluate the extent of the contamination. Two of these borings were subsequently converted to vapor extraction wells and connected to the VES in place for the car wash USTs. Vapor extraction in this area was performed from January to September 1996. In 1995 and 1996, EAI completed a subsurface investigation to evaluate the effectiveness of the VES system and the status of cleanup. Additional monitoring wells were installed to document the vertical extent of hydrocarbon-impacted soil remaining in the area of the release after operation of the VES. Based on the monitoring and the results from the subsurface investigation, the VES was deactivated in March 1996. In February 2004, EAI abandoned all the monitoring wells, lysimeters, and vapor extraction wells associated with the system. In December 2004, EAI was retained by Toyota to obtain a confirmation soil sample from the excavation of the former oil/water separator located at the Fueling Facility. The oil/water separator was removed in November 2004 during the decommissioning of the Fueling Facility. Analytical testing results of the soil samples were below the detection limit. To the Port's knowledge, an oil/water separator was present west of the Main Post Production Operation (PPO) Building prior to the sale of the property to 528 Investors LLC in March 2005. As of January 2005, the Port documented clean-out of the oil/water separator in November and December 2004 and had the system visually inspected for structural integrity in December 2004. **Lower Parcel** In 2004, three Downstream Defender® systems were installed in the storm water conveyance lines at Basins C and D as a part of system upgrades during the development of the Lower Parcel for Toyota. Basin descriptions are provided in response to Question 13(i). The Storm Sewer Manholes (STSMH) containing the treatment systems are: 2541, 2578 and 2583. The Downstream Defender® works to remove sediment, oil, and floatables from the storm water conveyance line. In addition to the Downstream Defenders, eight oil/water separators are in the stormwater conveyance system at	

EPA Question	Response	Reference
	the Lower Parcel. The locations of the separators are identified on Port drawing T4 2009-3027 at Tab 3. A summary of the investigations associated with the above treatment or control devices are included in response to Question 71.	
h. groundwater wells, including drilling logs;	**Lower Parcel** In March 2002, four groundwater monitoring wells (MW-1 through MW-4) were installed to evaluate PAHs in groundwater following the results of Phase II activities performed at the Lower Parcel. In addition, several groundwater monitoring wells associated with the T4 Slip 3 Upland Facility were previously located on the Lower Parcel. The monitoring wells were installed in 1993 during investigations of the former UPRR pipeline and Quaker State/Gearlocker areas and have since been abandoned. In 1998, additional monitoring wells were installed on the Lower Parcel to define the lateral and vertical extent of NAPL in groundwater from the former UPRR pipeline. All of these wells were abandoned in place in 2005, with the exception of monitoring well HC-13. This well is accessed on a quarterly basis for water level gauging in association with groundwater monitoring events conducted at the T4 Slip 3 Upland Facility. **Upper Parcel** In 1984 and 1985, Dames and Moore on behalf of Toyota installed five groundwater monitoring wells (W-1A through W-5) and five lysimeters to assess the 1984 Van Fuel release described above in response to Question 11. Between 1986 and 1990, B&A and EAI installed one monitoring well (W-6), in the area of the car wash USTs to delineate the lateral extent of the contamination. In 1996, EAI conducted a supplemental subsurface investigation that included installation of three groundwater monitoring wells (W-7 through W-9). In May and June 2002, EAI installed three groundwater monitoring wells (W-10 through W-12) in the former car wash area. In February 2004, EAI abandoned all the monitoring wells, lysimeters, and vapor extraction wells associated with Toyota operations. In 2002, Univar USA Inc. (formerly CHEMCENTRAL), was granted a permit and right-of-entry to install a groundwater monitoring well on the northeastern portion of the Upper Parcel (see response to Question 11 above). See also the response to Question 71 below.	See agreements at Tab 1. See site investigation records at Tab 6. See other environmental records at Tab 7.
i. storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied	**Stormwater** Stormwater discharges at the T4 ASA are permitted under the following:	See drawings and maps at Tab 3, specifically: • T4 2009-3027

EPA Question	Response	Reference
and maintained;	• Port's National Pollutant Discharge Elimination System (NPDES) Oregon DEQ Municipal Separate Storm Sewer System (MS4) Discharge Permit No. 101314. • Toyota holds a 1200-Z permit administered by DEQ. Under its permits, the Port conducts monthly inspections of stormwater filtration devices/features and regularly maintains and cleans catch basins and drain inlets annually. This maintenance was last performed at the property between September and October 2008. The following provides a summary of the storm water drainage basins at the T4 ASA property. Further details are provided in the enclosed references. **Lower Parcel** The Lower Parcel is drained by Basins A and B and portions of Basins C and D. The following is a brief description of those basins (Basin C is described below): • Basin A - The drainage area for Basin A encompasses approximately 18 acres of the southwestern 1/3 of the Toyota Auto Receiving Area. Basin A drains to one outfall which discharges to the Willamette River. The majority of the basin is paved, with the exception of buildings, structures and rail trackage. • Basin B - The drainage area for Basin B encompasses approximately 21 acres of the southern portion of the Toyota Auto Receiving Area. Basin B drains to one outfall which discharges to the Willamette River. The entire basin is paved, with the exception of buildings and structures. • Basin D - The drainage area for Basin D encompasses approximately 17 acres of land and includes an area of old tank foundation/footings , rail and vehicle roads, gravel pads associated with the Terminal 4 Slip 3 Upland, and a small portion of the Toyota Auto Receiving Area. The majority of Basin D drains to one outfall which discharges directly to the Willamette River. There are also three outfalls within Basin D that discharge directly into Slip 3. The catchments for each of these outfalls are small. The majority of the basin is paved. During redevelopment of the Toyota facility in 2002 and 2003, the Port installed four bioswale culverts to naturally filter storm water draining from Basins A and B. In addition, a Downstream Defender® system was installed in the storm water conveyance line for Basin D at manhole STSMH 2583 in 2004. In addition to the Downstream Defenders, eight oil/water separators are in the stormwater conveyance system at the Lower Parcel. The locations of the separators are identified on Port drawing T4 2009-3027 at Tab 3. **Upper Parcel** The Upper Parcel is drained by portions of Basins C, U, V, W, X and Y. The following is a brief description of those basins:	See other environmental records at Tab 7. See MS4 permit information in Tab 13 of the Port's 104(e) response for Terminal 5, submitted to EPA and dated May 16, 2008.

EPA Question	Response	Reference
	• Basin C - The drainage area for Basin C encompasses approximately 74 acres on the northern half of the Toyota Auto Receiving Area, the Bench, and 2/3 of the former Toyota Auto Processing Center. Basin C drains to one outfall which discharges to the Willamette River. The majority of the basin is paved, with the exception of gravel roadways and rail trackage. Two Downstream Defender® systems were installed in the storm water conveyance line for Basin C at manhole STSMH 2541 and 2578 in 2004. The systems were installed during the development of this area for additional automobile storage for Toyota. • Basins U through Y – The drainage area for Basins U through Y is less than 20 acres and only drains a portion of the Upper Parcel. Collectively, these basins represent a shared conveyance system that connects to the City of Portland's Outfall 52C (OF-52C). The portion of the T4 ASA Upper Parcel that drains to these basins includes portions of the former Toyota Processing Yard and a portion of the Former Toyota Auto Processing Center. Toyota currently holds a 1200-Z stormwater permit for the Lower Parcel. This permit historically covered the Upper Parcel but has not been in effect since Toyota ceased processing operations at the Upper Parcel in 2004. Toyota received a 104(e) request from EPA and should provide details on its stormwater system and management in its response. **Sanitary Sewer** Currently, sanitary sewer lines from the T4 ASA connect to a City of Portland main trunk line located off of the property. Batch discharges to the sanitary are periodically performed under permits with the City of Portland. This includes the discharges of decant water from stormwater cleanout and terminal sweeping activities. See also the response to Question 41. **Septic Tanks and Cesspools** Three cesspools were historically located on the Upper Parcel. The cesspools were decommissioned and removed and/or filled with rock in 1986 during expansion of Toyota's facilities. See drawing T4 86 500 3/10 at Tab 3 and property transaction records at Tab 5. Information pertaining to the historical sanitary and storm sewer systems is provided in response to Question 18 below.	
j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed; including, but not limited to, the tanks associated with the St. Johns Auto Wrecking Yard;	**Lower Parcel** No records were identified that indicate subsurface disposal fields, Underground Injection Control (UIC) wells, USTs or other underground structures existed at the Lower Parcel. **Upper Parcel** **Underground Storage Tanks** The following underground storage tanks (USTs) were identified in connection with the Upper Parcel.	See drawings and maps at Tab 3. See property transaction records at Tab 5. See site investigation records at Tab 6. See other environmental records at Tab 7.

EPA Question	Response	Reference
	Conqueror's Bible College UST Summary. In March 1985, four USTs were removed from the area of the college building. Records indicate the one UST may have contained diesel or heating oil. Contents of the remaining three USTs are unknown. Three of the USTs were near a utility building northwest of the main building (ranging in size from 3,600 to 5,600 gallons), and one 2,500-gallon UST was located near the main building entrance. A permit for the 2,500-gallon UST was issued in September 1943 (per a Fire Marshal record). Port personnel who observed the UST removals indicated that no impacted soil was encountered during the UST excavations. **St. Johns Wrecking Yard UST Summary.** In July 1986, during site preparation for expansion of the Toyota facility, Clearwater Construction Company removed two USTs at the Upper Parcel. Port records suggest additional USTs were removed from the former wrecking yard and adjacent residences, but this information could not be confirmed. All of the USTs were removed, however, prior to occupancy by TLS/VPI. **Toyota UST Summary.** Based on available historical information, Toyota had a total of 13 USTs at its facility, all of which have been removed. A summary of these USTs is as follows: • Seven USTs (USTs 1 through 7) were associated with the car wash system: three process water USTs; one kerosene UST; and three Van Fuel USTs (Van Fuel is similar to kerosene and was used to remove a protective coating placed on the cars prior to shipping). Six of the seven USTs had a 20,000-gallon capacity and one had a 10,000-gallon capacity. These USTs were removed in March 1991. • Two 10,000-gallon gasoline USTs (USTs 8 and 9) were located at the southern fuel island. These USTs were removed from the facility in October 1995. • Two 10,000-gallon gasoline USTs (USTs 10 and 12) were located at the western fuel island. These USTs were removed from the facility in August 1994. • Two 10,000-gallon gasoline USTs were installed in April 1994 at Toyota's fueling area. These USTs were removed in 2004. Additional details on the removal of these USTs are included in response to Question 64 and 71. **Underground Clarifiers** Toyota used two underground clarifiers in association with the former car wash at the Upper Parcel. Wastewater was collected by strip drains in the car wash, directed to two underground clarifiers (to capture solids), and then into two ASTs (discussed above) and recycled for reuse. Excess process water was discharged to the sanitary sewer. During its period of operation, about 25% of the wastewater was discharged daily to the sewer and replaced by fresh water. Although generated relatively infrequently (every couple years), Toyota's sludges from the fueling facility oil/water separator and car wash clarifiers were handled as hazardous waste (Toyota facility been a small quantity generator since 1997 (DEQ ID No. ORD081971798) In December 2004, EAI, on behalf of Toyota, removed the clarifiers and collected soil samples in the vicinity. Analytical testing results of all soil samples were below detection limits.	

EPA Question	Response	Reference
	Underground Hoists In 2004, trenches that historically held underground hydraulic hoists were uncovered in the facility maintenance shop. Following building demolition, soil at the base of each excavation was examined. There was no evidence of odor, staining, or discoloration at any location. Soil samples were obtained from beneath the hoists and analyzed for gasoline-, diesel-, and heavy oil-range hydrocarbons. Analytical testing results of the samples were below the detection limits for all of the constituents. Toyota received a 104(e) request from EPA and should provide additional details on this question in its response.	
k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the Property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;	Following its acquisition in 1917, the City CPD began preparation for the development of the property. Trees and vegetation were removed, and fill material was deposited across the low-lying ground and leveled with horse teams. Fill was placed into the offshore shallows to extend the riverbank out into the channel. With the physical preparation of the land complete, construction for development of the property as a marine terminal ensued. 1943 Circular building, which later became the Bible College, constructed. 1959-60 Dredged material placed on the Lower Parcel at the former steel yard area. 1968-69 Approximately 2.5 acres of land filled and auto import storage yard constructed. 1969 Berth 417 (floating auto dock) constructed. 1970-73 Lower Parcel graded to create the auto receiving facility. 1972 Berth 416 (second floating auto dock) constructed. 1973-74 Berths 414 and 415 constructed. 1973-75 Fill material placed between Pier 5 and the auto receiving area to create the Terminal 4 steel dock and steel yard area. 1976 The Toyota Processing Facility (Upper Parcel) constructed including the Bench area and Berth 417 was relocated to the Port's Terminal 6 facility on the Columbia River. 1977 Demolition of wood barracks from World War II military debarkation on Tax Lot 600 (R961021130) as part of the site preparation for Toyota. 1978 UPRR auto rail yard developed. 1979 Upper Parcel facility expanded. 1980 Warehouse 6 (also known as the steel warehouse) constructed. 1982 Berth 415 dock office constructed. 1985 Former wrecking yard developed during Toyota Expansion I. 1989 The dolphins at Berth 414 rebuilt. 1990 Warehouse 7 constructed. 1990 Guard shack constructed at N. Roberts Street entrance. 1991 Former Bible College property paved for the Toyota Expansion II Project. 1998 Auto dock reinforced and new dolphins installed. 2002 Rail Expansion Project Near Milepost 3.4 – Included grading of roadbed for trackage, installation and maintenance for drainage structures, modification of overhead utilities and construction of portions of rail trackage.	See agreements and contracts at Tab 1. See property transaction records at Tab 5. See other environmental records at Tab 7.

EPA Question	Response	Reference
	2002-05 Toyota Redevelopment Project – Toyota's operations at the Upper and Lower Parcels were combined into one location at the Lower Parcel. The redevelopment included construction of new buildings, railway and yard by Toyota, and removal of existing buildings (including Warehouse 6 and Warehouse 7) and riverbank and dock work by the Port. As part of the project, the Port restored 1,700 linear feet of riverbank to native conditions. 2003 Connection of Toyota Facility storm water conveyance system to Port Storm Water existing and new storm water conveyance systems. 2004 Demolition of Car Wash trench, two clarifiers, a wash pad, and two hydraulic hoists associated with the car wash and maintenance building formerly known as Vehicle Processors. Storm Sewer System upgrades during the development of additional Toyota automobile storage. 2004-05 All of the old buildings on Upper Parcel removed except the PPO Building, which was sold to 528 Investors. 2007 PPO Building expanded	
l. all maps and drawings of the Property in your possession; and	Maps and drawings identified as relevant to the T4 ASA property are included at Tab 3 and in property transaction records located at Tab 5.	See drawings and maps at Tab 3. See property transaction records at Tab 5.
m. all aerial photographs of the Property in your possession.	Aerial photographs relevant to the T4 ASA property are included in Tab 4.	See aerials photographs at Tab 4.
14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.	The riverward property boundary for the Lower Parcel of the T4 ASA property is the ordinary high-water line and was established by the Exchange and Sale of Property, Settlement and Mutual Release between the Port and DSL in 1987. See also response to Question 4 above.	
15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.	See records at Tab 5 and Tab 6.	See property transaction records at Tab 5. See site investigation records at Tab 6.
16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information: a. a map showing the unit/area's boundaries and the	There are no "solid waste management units" at the property as that term is defined and regulated under the Resource Conservation and Recovery Act (RCRA). To the extent that EPA's question was not intended to be limited to solid waste management units regulated under RCRA, the following response applies to areas where waste materials, either otherwise managed under RCRA or non-regulated, are or were in the past managed. It is the Port's understanding that TLS used and stored hazardous and non-hazardous materials as part of its	See property transaction records at Tab 5, specifically: Preliminary Environmental Site Assessment and Exit Audit, Toyota Logistics Services, Inc. – Upper Parcel, prepared by Hart Crowser, dated December 7, 2004.

EPA Question	Response	Reference
location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas; b. dated aerial photograph of the site showing each unit/area; c. the type of unit/area (e.g., storage area. landfill, waste pile. etc.); and the dimensions of the unit/area; d the dates that the unit/area was in use; e. the purpose and past usage (e.g., storage, spill containment, etc.); f. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area and; g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.	operations. A summary of those materials and locations identified prior to TLS vacating the Upper Parcel is documented in the PESA included in Tab 5, including: • Main PPO Building • Car Wash • Hazardous Waste Storage Area • Facility Maintenance Shop • Mechanics Shop Based on records from a Port walkthrough in 2008, material storage at Toyota's facility at the Lower Parcel included: • Hazmat Storage Area of the Mechanic Shop • Body Shop A site plan showing the locations of these areas is included in the PESA at Tab 5. Note that tenants are responsible for their individual leaseholds and may have information responsive to this question that is not readily available in the Port's records.	See site investigation records at Tab 6.
17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.	Not applicable.	
18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:	Historical stormwater and sanitary sewer system information is contained in the maps and drawings included at Tab 3. A general description of the stormwater system that is present at the T4 ASA property is provided in response to Question 13 (i) above.	See drawings and maps at Tab 3.
a. the location and nature of each sewer line, drain, ditch, or tributary;	A general description of the stormwater system at the T4 ASA property is provided in response to Question 13 (i) above. See also Port Drawing T4 2009-3027 at Tab 3 for the current location of the stormwater features at the property. The property is currently connected to the City of Portland's sanitary sewer. Historical stormwater and sanitary sewer system information, to the extent it is available, is contained in the maps and drawings included at Tab 3.	See drawings and maps at Tab 3, specifically: • Drawing T4 2009-3027 See property transaction records at Tab 5. See site investigation records at Tab 6.
b. the date of construction of each sewer line, drain, ditch, or tributary;	Portions of the Upper Parcel were connected to the City of Portland's municipal sanitary sewer in 1965, 1971 and 1976. The sanitary sewer and stormwater systems were initially constructed on the Lower Parcel between 1971 and 1973. These systems were upgraded during the Toyota redevelopment project in 2002. No additional information was available. Historical stormwater and sanitary sewer system information, to the extent it is available, is contained in the	See maps and drawings at Tab 3.

EPA Question	Response	Reference
	maps and drawings included at Tab 3.	
c. whether each sewer line, or drain was ever connected to a main trunk line	Sanitary sewer lines from the T4 ASA property connect to the City of Portland main trunk line located off of the Terminal 4 property. For the current location of and details on stormwater and sanitary sewer system features, see Port Drawing T4 2009-3027 at Tab 3.	See drawings and maps at Tab 3, specifically: • Drawing T4 2009-3027
d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and	Based on review of the Port's MS4 permit records, Toyota has oil/water separators located in its vehicle maintenance and mechanical shops. The separated water is discharged to the City of Portland's sanitary sewer system.	See other environmental records at Tab 7.
e. any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:	See response in sub-bullets (i) through (ii) below.	
i. the areas serviced by the outfalls; and	For the current location of and details on outfalls, see Port Drawing T4 2009-3027 at Tab 3. See also the response to Question 13(i) above.	See drawings and maps at Tab 3, specifically: • Drawing T4 2009-3027
ii. the type of outfall (i.e., storm water or single facility operational).	All of the outfalls that serve the T4 ASA property are dedicated to stormwater.	
19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention or Maintenance Plans or Spill Plans developed for different operations during the Respondent's operation of each Property.	Stormwater at the T4 ASA property is managed under the Port's Municipal Separate Storm Sewer System (MS4) Discharge Permit No. 101314 as well as under Toyota's NPDES General Permit 1200-Z. The MS4 permit requires a stormwater management plan and Toyota's permit requires a stormwater pollution control plan (SWPCP). These documents are included in Tab 7. Toyota received a 104(e) request from EPA and should provide information on stormwater in its response.	See MS4 permit information in Tab 13 of the Port's 104(e) response for Terminal 5, submitted to USEPA and dated May 16, 2008. See other environmental records at Tab 7.
Section 4.0 - Respondent's Operational Activities		
20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and if applicable, ceased.	With the exception of TL 2200 in the Upper Parcel, the Port is the current owner of the T4 ASA property. Since its acquisition, the Port has acted as the property manager for the tenants that lease the facilities, yard space, and berths at the property. As the owner, the Port engages in grounds maintenance (fencing and landscaping) and is responsible for maintaining property infrastructure (e.g., water and sanitary lines), berths (e.g., piling replacement), the non-leased areas, and a portion of rail trackage. The Port also performs certain activities for tenants, which includes maintaining, in good working order, interior systems of leased structures (plumbing and sprinklers) and exterior structural components (windows, siding, roofs) as well as general maintenance of pavement and rail leads. See also the response to Questions 4 and 30.	

EPA Question	Response	Reference
21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify: a. in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled; b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored. treated, disposed, or otherwise handled; c. how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and d. the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.	The Port acts as the property manager for the tenants and users that lease and use the yard space and berths at the property. Under its permits, the Port regularly maintains and cleans catch basins and drain inlets. Solids generated from those activities are transported off-site by a licensed waste hauler. See records at Tab 7. See also response to Questions 6(b) and 13(i). See the response to Question 64 for discussion of materials generated from excavation activities. Contractors associated with those occurrences are identified in Question 6 (b) above. The Port's records contained some information on the materials handled by Toyota at its facility. Those records are included in Tab 7.	See property transaction records at Tab 5 See other environmental records at Tab 7.
22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste, or materials and whether any such hazardous substances, waste, or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.	The Port has had general maintenance responsibility for the berths (e.g. maintenance dredging, piling replacement) during its ownership (1971 to present) of the Lower Parcel. Activities by Port tenants that occurred at the berths were generally berthing and wharfing and related activities (loading and unloading products across docks). Over-water activities at the Lower Parcel are discussed by area below; additional information is contained Tabs 3, 5 and 7. **Berth 414 and Berth 415** Berths 414 and 415 were constructed in 1973 and 1974, respectively. The berths were built to serve as a steel handling wharf and have been used for preferential berthing of ships for the unloading of vehicles and steel products. In 1985, the dolphins at Berth 414 were rebuilt. **Berth 416** Berth 416, the second floating auto dock, is a converted liberty ship that was constructed in 1972. Prior to the development of the Toyota processing facility at the Lower Parcel, ships loaded with Toyota vehicles docked at Berth 416 and longshoremen drove the vehicles off of the ship and parked them in the auto receiving area. **Berth 417** Berth 417 was constructed in 1969 and was used for unloading vehicles until its relocation to Terminal 6 in 1976. There are no over-water activities at the Upper Parcel as it is not river-adjacent. Available information from regulatory agencies and Port records were reviewed for information on spills and releases. It should be noted that most regulations mandating the reporting of spills and releases did not come into effect until after 1970; therefore, there are few if any reported spills and releases from before 1970. The Port did not own the property until 1971. Based upon available records, the following over-water spills and	See drawings and maps at Tab 3. See property transaction records at Tab 5. See other environmental records at Tab 7. See other environmental records at Tab 7.

EPA Question	Response	Reference
	spills into the river have been identified as follows. • On June 25, 1981, an oil release occurred at Berth 415 from a pipe originating at the Toyota plant (quantity not reported). • On April 11, 1982, diesel spill on the deck of a ship at Berth 414 and released approximately one gallon of oil to the Willamette River. • On March 15, 1985, an unknown quantity of oil was released to the Willamette River in the vicinity of Berths 415 and 416. • On March 18, 1994, a light sheen was observed in the water around vessel M/V BIO BIO I docked at Berth 415. The source and quantity of the material are unknown. • On June 4, 1995, the culvert between Berths 415 and 416 overflowed during a heavy rain event and caused a soap-like foam to form on the river. The foam extended halfway to the Berth 416 float and was monitored but dissipated quickly with the heavy rain and flow of the river. The Coast Guard was notified and they determined on-site response was not necessary based on the nature of the observations. • On April 6, 2000, a hydraulic cylinder blew on the car carrier vessel CENTURY LEADER 3. Less than one liter of hydraulic fluid was released to the river. This environmental condition in-water near the T4 ASA property was also observed: • On September 25, 1995, an oily film was observed upriver from Berth 416. The Coast Guard was contacted. The source of the film could not be determined.	
23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.	Over-water structures at the T4 ASA Lower Parcel have generally been used for the unloading of vehicles and steel products. The loading and unloading of vessels is governed by the Port's regulatory tariff, as amended from time to time. As discussed in response to Question 11, the Lower Parcel was operated by the City CPD from 1966 to 1971. During the City CPD's ownership, Berth 417 was constructed for the purpose of unloading vehicles. Over-water activities conducted at the Lower Parcel by the Port include general maintenance responsibility for the berths (e.g. maintenance dredging and piling replacement). See responses to Questions 11 and 22 above.	
24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste, or materials and whether any such hazardous substances, waste, or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.	In 1982, the Port obtained a lease with DSL (ML-681) for 3.013 acres of submerged land for barge tie-up and storage. The lease with DSL was renewed in 1987 and 1992 and remained in effect until August 31, 1997. In 1989, the Port obtained a lease with DSL (ML-731) for 1.308 acres of submerged land for barge tie-up and storage. The lease with DSL was renewed in 1992 and remained in effect until August 31, 1997.	See agreements and contracts at Tab 1. See property transaction records at Tab 5.

EPA Question	Response	Reference
	In 1999, the Port obtained a lease with DSL (ML-10506) for 3.013 acres of submerged land for barge moorage and staging of equipment and barges. The lease was renewed in 2004, but the leased area was reduced to 2.44 acres. The renewed lease was for spud barge moorage and marine industrial services and was in effect until August 31, 2009. The above DSL leases were subleased to Knappton Corporation and Brix Maritime (dba Foss Maritime) at various times. See also response to Questions 4, 11 and 12 above.	
25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 to the present). Provide the brand name of all pesticides or herbicides used.	Available records indicate that the use of pesticides and herbicides at the T4 ASA property by the Port is limited in nature and consists of the standard weed and pest maintenance that can be expected at a paved and developed facility. The pesticides and herbicides used on the property have included Ranger Pro, Roundup Pro, Confront, Snapshot, Dimension 2 EW, Garlon 3A, Wil-Power, Pendulum 2G, Pendulum Aquacap, Casoran, Regal Star, Crossbow, Windbreak, Rodeo, Powerzone, Barricade, Gallery, Dimension Ultra, Aqua Master, Simazine 4L, Sim-Trol 90DF, Devrinol 5G, and L1700 Surfactant. Application quantities and frequency vary but range from approximately 1 to 39 gallons of diluted solution. Reports documenting quantities and application methods from 2000 through 2009 are included at Tab 7.	See other environmental records at Tab 7.
26. Describe how waste is transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.	Based on available records, wastes for which the Port has had responsibility at the T4 ASA property have been transported from the property by licensed waste removal contractors. It should be noted that there are tenants at the Upper and Lower Parcels who also likely generate/d and handle/d waste materials. See the response to Question 64 for discussion of wastes generated from soil excavation activities. Transportation contractors associated with those occurrences are identified in Question 6 (b) above. Information on some of Toyota's contractors were included in the available records and a list of those entities is also included in response to Question 6 (b) above; however, Toyota received a 104(e) request from EPA and should provide details on its waste handling practices in its response.	See agreements and contracts at Tab 1. See site investigation records at Tab 6. See other environmental records at Tab 7.
27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify: a. the persons with whom the Respondent made such arrangements; b. every date on which Respondent made such arrangements; c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all materials involved in each such arrangement;	Not to the Port's knowledge.	

EPA Question	Response	Reference
d. in general terms, the nature and quantity of the non-hazardous materials involved in each such arrangement; e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement; f. the owner of the materials involved in each such arrangement, if not Respondent; g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions; h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated; i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area: j. who selected the location to which the materials were to be disposed or treated; k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and l. any records of such arrangement and each shipment.		
28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).	Not applicable.	
29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.	Not applicable. The Port did not conduct any activities at the Terminal 4 property that could be or were depicted in a schematic diagram.	
30. Provide a brief description of the nature of Respondent's operations at each location on each Property including: a. the date such operations commenced and concluded; and b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.	As described in response to Question 4 above, the Port is the current land owner of the T4 ASA property and has owned portions of the property since 1971. Since that time, the Port has acted as the property manager for the tenants that lease the facilities, yard space and berths at the property. As the owner, the Port engages in grounds maintenance (fencing and landscaping) and is responsible for maintaining property infrastructure (e.g., water and sanitary lines), berths (e.g., piling replacement), the non-leased areas, a majority of the rail yard and switches, and some terminal equipment. The Port also performs certain activities for tenants, which includes maintaining in good working order interior systems of leased structures (plumbing and sprinklers) and exterior structural components (windows, siding, roofs) as well as general maintenance of pavement and rail lines. Specific information on current and historical tenants and their respective operations is discussed in response to Question 11.	

EPA Question	Response	Reference
31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.	See response to Questions 4 and 30.	
32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.	Not applicable.	
33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.	MSDSs for the pesticides and herbicides described in response to Question 25 are included in Tab 7.	See other environmental records at Tab 7.
34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to: a. the types of materials used to clean/maintain this equipment/machinery; b. the monthly or annual quantity of each such material used. c. the types of materials spilled in Respondent's operations; d. the materials used to clean up those spills; e. the methods used to clean up those spills; and f. where the materials used to clean up those spills were disposed of.	Not applicable.	
35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.	The Port has implemented numerous Best Management Practices (BMPs) at the T4 ASA property as part of its Environmental Management System (EMS) Program and continual improvement policy. Under the EMS, the Port provides guidance to employees on the practice of spill prevention and response. Individual tenants are responsible for management of spills on their respective leaseholds. In accordance with the Port's May 1, 2006 Stormwater Management Plan under the MS4 permit, the Port has implemented BMPs to reduce the likelihood of releases and potential exposure to stormwater systems. This includes implementation of a spill response program for Port-operated properties to prevent, contain and respond to spills that may discharge to the stormwater system. The Port has emergency response contractors on-call 24 hours a day and a procedure to notify the appropriate authorities and responsible persons.	
36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information: a. its physical state; b. its nature and chemical composition; c. its color; d. its odor. e. the approximate monthly and annual volumes of each	See response to Questions 39 and 40 for information regarding wastes generated related to specific projects.	

EPA Question	Response	Reference
type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and f. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.		
37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.	Not applicable. The Port did not conduct any activities that could be or were depicted in a schematic diagram.	
38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.	The Port is the current owner of the T4 ASA property. The following current employees have (or have had) responsibility for the Port's environmental matters associated with Terminal 4: • David Breen, Environmental Project Manager II • Sebastian Degens, Marine Planning & Development Manager • Jennifer Fonseca-Littrell, Environmental Specialist I • Marla Harrison, Marine & Industrial Development Environmental Manager • Stan Jones, Aviation Environmental Compliance Manager • Sam Ruda, Director of Marine & Industrial Development • Dorothy Sperry, Corporate Environmental Manager • Richard Vincent Environmental Project Manager II • Bill Wyatt, Executive Director Former employees who have had responsibility for the Port's environmental matters associated with Terminal 4 include, but may not be limited to: • John Childs, Environmental Project Manager II (1997-2003) • Katherine Futornick, Corporate Environmental Manager (1994-1999) • Danil Hancock, Waterway Resources Manager (1988-1994) • Russell Korvola, Environmental Services Manager (1988-1995) • Cheryl Koshuta, Chief Environmental Officer (1999-2007) • Nicole LaFranchise, Environmental Project Manager III (2006-2009) • Kristi Maitland, Environmental Project Manager II (2003-2005) • Roland Montagne, Environmental External Affairs Manager (1986-1999) • Don Pettit, Environmental Project Manager II (2005-2007) • Quentin Pitts, Manager, Project Environmental Resources (1995-1996) and Environmental Project Manager II (2006-2008) • Padraic Quinn, Environmental Project Manager II (1993-2002)	

EPA Question	Response	Reference
39. For each type of waste describe Respondent's contracts, agreements or other arrangements for its disposal, treatment, or recycling.	The following contract was identified in the available records: • On June 16, 1986, Clearwater Construction Company entered into a sub-contract agreement with Mike Shough Trucking Company for the purpose of hauling petroleum-contaminated soil that was excavated at the Upper Parcel. See also the response to Questions 6 and 64.	See agreements and contracts at Tab 1. See other environmental records at Tab 7.
40. Provide copies of such contracts and other documents reflecting such agreements or arrangements: a. state where Respondent sent each type of its waste for disposal, treatment, or recycling; b. identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request); c. if Respondent transported any of its wastes away from its operations, please so indicate; d. for each type of waste specify which Waste Carrier picked it up; e. indicate the ultimate disposal/recycling/treatment location for each type of waste. f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and g. state the basis for and provide any documents supporting the answer to the previous question.	Available contracts are included in Tab 1. See response to Questions 6, 39 and 64 for information pertaining to types of waste, waste carriers, and disposal locations.	See agreements and contracts at Tab 1. See property transaction records Tab 5. See other environmental records at Tab 7.
41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to: a. the nature and chemical composition of each type of waste; b. the dates on which those wastes were disposed; c. the approximate quantity of those wastes disposed by month and year; d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre-treatment plant, Publicly Owned Treatment Works (POTW), etc.); and e. whether and what pretreatment was provided.	The following is a summary of permitted discharges to sanitary sewer at the T4 ASA property. **<u>Discharges by the Port</u>** • On March 3, 1973, the City of Portland approved in a letter the Port to dispose of accumulated rain water and condensate from the hull of the auto dock into the City's sanitary sewer system which flows to the City of Portland Publicly Owned Treatment Works (POTW). **<u>Known Discharges by Others</u>** • On March 19, 1991, the City of Portland verbally approved a Batch Discharge Permit to the storm sewer for EAI (on behalf of Toyota) to discharge the water contained in six 20,000-gallon USTs on the Upper Parcel. The permit also allowed for modification through an addendum for the water from UST #1 to be discharged following carbon filtration. It does not appear that option was utilized. In addition, it is the Ports understanding that Toyota has oil/water separators located in its vehicle maintenance/mechanical shops on the Lower Parcel that drain to the City of Portland's sanitary sewer system.	See other environmental records at Tab 7.

EPA Question	Response	Reference
	Toyota received a 104(e) request from EPA should provide information related to this question in its response.	
42. Identify any sewage authority or treatment works to which Respondent's waste was sent.	Discharges that went to the City of Portland POTW are described above.	
43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.	No records have been located that identify settling tank, septic system, or pretreatment system sludges or other treatment wastes for any Port activities at the T4 ASA property.	
44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.	To the Port's knowledge, neither the Port nor the Port's contractors used the T4 ASA property for activities related to shipbuilding, ship maintenance or repair.	
45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.	Not applicable.	
46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.	Not applicable.	
47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.	During a walkthrough of the T4 ASA property in 2004, two pad-mounted transformers were observed on the Upper Parcel on TL 2200. One of the transformers was located near the northwest corner of the former Main PPO Building and the other was located southeast corner of the mechanic's shop. Around the time of the walkthrough, PGE, the owner of the transformers, verified that both transformers contained less than 1 ppm PCBs. The Port sold TL 2200 to 528 Investors LLC in 2005 and as such, is not aware of the current status of these transformers.	See property transaction records at Tab 5.
48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.	See response to Question 47 above. No additional information was available.	
49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the Property.	Not applicable.	
Section 5.0 - Regulatory Information		

EPA Question	Response	Reference
50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and environmental concerns.	Environmental regulators/authorities include: • Federal – EPA, Army Corps of Engineers, U.S. Coast Guard; National Marine Fisheries Service (NMFS) • State – Oregon DEQ; Oregon DSL, Oregon State Fire Marshal; Oregon Department of Transportation; Oregon Water Resources Division; Oregon Fish & Wildlife • Local – City of Portland Bureau of Environmental Services, City of Portland Land Use Hearings Office, City of Portland Office of City Auditor, City of Portland Fire Bureau, City of Portland Bureau of Planning, City of Portland Harbormaster Health and safety regulators/authorities include: • Federal - U.S. Department of Labor, Office of Worker's Compensation Programs; Coast Guard • State - State of Oregon, Department of Consumer and Business Services; State of Oregon Worker's Compensation Division; Oregon OSHA • Local - City of Portland Police Bureau; City of Portland Fire Bureau; Multnomah County Sheriff's Department Individual contacts within the above organizations are included in the relevant records in Tabs 5 through 8.	
51. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.	The following occurrences were identified in available records (post-1971); note that the list is not limited to concerns raised with the Port, and includes concerns raised with Port tenants to the extent the Port had those records available; also note that while certain violations were issued to the Port, the Port's tenant may have been the entity responsible for the operations that caused the violation or notice. • In April 1996, DEQ made a site visit to TLS (formerly Vehicle Processors, Inc.). Several violations were noted, including open or improperly labeled hazardous waste containers, lack of documentation of weekly inspections, lack of employee training, and lack of documentation of reporting requirements. Indications of spills or releases were not indicated. These violations only indicate that hazardous waste regulations were not adequately followed. • On March 12, 2001, DEQ issued a Notice of Noncompliance (NON) to TLS following an inspection of its facility on March 7, 2001. Two violations were noted during the inspection: (1) storing hazardous waste more than 180 days, and (2) failure to label containers with an accumulation start date. Seven other waste management issues were also listed (e.g., waste codes, labeling, inspections). DEQ requested action on the violations and issues, all of which were addressed and documented by Toyota in a May 14, 2001 letter.	See other environmental records at Tab 7.

EPA Question	Response	Reference

52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits. NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.	The following environmental permits and applications for the T4 ASA property were identified in available records.
	
	Port
	• In February 1971, the Port applied for a permit from the U.S. Army Corps of Engineers to construct a floating wharf, including the construction of a riprap blanket driving four 22-pile dolphins, four 16-pile dolphins, a walkway with a support and brace pile spaced at five-foot intervals, and two ramp abutments. The Corps subsequently issued Permit No. 1522-13(Willamette R.-Float Wharf)-1 to the Port for the work on April 6, 1971.
	• On April 30, 1976, the Port applied for a U.S. Army Corps of Engineers permit to construct a new storm drainage system outfall between Berth 415 and 416.
	• On June 8, 1976, the Port applied to the City of Portland for a Conditional Use Permit to move 66,000 cubic yards of soil.
	• On July 20, 1976, the Port applied for an Air Contaminant Discharge Permit (Application #0857) for a new oil-fired boiler and Clayton water tube associated with the Toyota Auto Processing Center car wash. On October 22, 1976, DEQ issued Air Contaminant Discharge Permit #26-2974 to the Port for discharges from fuel burning equipment associated with a boiler at the Toyota facility. The permit was in effect until September 1, 1981.
	• On February 22, 1982, the U.S. Army Corps of Engineers issued Permit 071-OYA-A-004385 to the Port for modification of Berth 416, which included constructing new pile dolphins, reconstructing existing pile dolphins, and relocating 150 feet of walkway.
	• On February 21, 1989, the U.S. Army Corps of Engineers issued Special Conditions Permit 071-OYA-A-008385 to the Port for construction of a catwalk at Berths 415 and 416 and to remove a timber dolphin, and place two pile bents at River Mile 5.2.
	• On March 12, 1990, the Port submitted an application to the City of Portland for a Greenway Permit as part of the construction of Warehouse 7.
	• On August 15, 1990, the Port submitted an application to the U.S. Army Corps of Engineers for a permit for repair and rehabilitation of Berth 416. The Corps subsequently issued Permit 071-OYA-A-9239 to the Port on October 24, 1990 for the project.
	• On September 18, 1990, the Port was issued Greenway Permit 18-90 for the replacement and repair of the bankline with riprap.
	• On May 16, 1991, the Port was issued a Special Waste Permit to dispose of 45 cubic yards of TPH-impacted soil at the Hillsboro Landfill in Hillsboro, Oregon. The impacted soil was identified during a surface soil investigation in the area of a footpath and drainage-way shared by Port and the Last Chance Wrecking Yard. See the response to Questions 64 and 71 below.
	• The following applications and permits and were identified in connection with the Toyota Redevelopment Project:
	  ○ In June 2001, the Port submitted a Section 404/Section 10 permit application to the Corps and DSL as part of the Toyota Redevelopment Project. This permit application requested authorization to stabilize and enhance the bank of the Willamette River adjacent to the Auto Receiving Area at the project site.
	  ○ On August 31, 2001, The Port was issued an Oregon DEQ Water Quality 401 Certification
		See agreements and contracts at Tab 1.
		
		See other environmental records at Tab 7.
		
		See MS4 permit information in Tab 3 of the Port's 104(e) response for Terminal 5, submitted to EPA and dated May 16, 2008.

EPA Question	Response	Reference
	associated with U.S. Army Corps of Engineers Permit No. 2001-00553. o On September 28, 2001, the Port was issued DSL Permit No. 24231-RF. The permit was acquired to support reconfiguration of the existing Toyota facility and was subsequently modified and renamed 24231-RF MODIFIED. • DEQ issued NPDES Municipal Separate Storm Sewer System (MS4) Discharge Permit No. 101314 to the Port on September 7, 1995 and renewed it on July 27, 2005. An application to renew the permit was submitted on September 2, 2008 and the renewal is currently pending. The following permits and applications were identified related to the permitted dredging and/or filling of the T4 ASA property: • In November 1949, Investors Associated, Inc. issued a Permit for Spoil Disposal Area to the War Department and the U.S. Army Corps of Engineers. The permit indicates shore work would be performed by the Port. • In July 1969, the City CPD applied for a permit from the U.S. Army Corps of Engineers to dredge at River Mile 5.4 to 5.5 and place the material upland at its adjacent property (the Lower Parcel). • On July 8, 1971, the U.S. Army Corps of Engineers issued permit 1522-15(Willamette R.-Outfall Structure)-1 to the Port (Public Notice NPP 71-95) to construct two 18-inch outfalls (one at Slip 1 and one at the T4 ASA property) and a compacted fill at the T4 ASA property. • The following applications and permits were identified in connection with expansion of the auto receiving area at Berth 416: o On January 5, 1972, the Port applied for a U.S. Army Corps of Engineers permit for filling and slope protection at the auto dock at River Mile 5. On June 5, 1972, the Corps issued permit number 000645(Willamette R.-Misc.) to the Port for the project. On December 24, 1974, the Corps extended Permit 071-OYA-1-000645 until March 31, 1975. o On February 1, 1972, the Port applied for a City of Portland Conditional Use Permit for slope construction and for deposition of dredge fill and rock rip-rap. o On January 1, 1973, the Oregon Division of State Lands issued Fill Material/Removal Permit No. 1033 to the Port for the project. A renewal application for the permit was filed on January 10, 1974 and was approved on January 25, 1974. • On January 5, 1973, the Port applied for a U.S. Army Corps of Engineers permit for dredging and filling in connection with construction of a steel handling facility. The Corps subsequently issued Permit Number 071-OYA-1-001042 to the Port for the project on March 27, 1973. • On September 6 and 7, 1973, the U.S. Army Corps of Engineers and the Oregon Department of State Lands, respectively, approved the Port's request for emergency dredging at the auto dock with material placement in the end of Swan Island Lagoon. • On February 5, 1975, the Port applied for a U.S. Army Corps of Engineers permit for periodic maintenance dredging at the Port's marine terminals, including the T4 ASA. The Corps issued Permit 071-OYA-1-001901 (Willamette River – Dredging) to the Port on July 11, 1975 and the Oregon Department of State Lands subsequently issued Permit 2087 on July 15, 1975. • On May 27, 1976, the City of Portland issued two Conditional Use Permits to the Port: one for a fill of up to 8,000 cubic yards, and one for Willamette River Greenway Conditional use related to development of an 11–acre area between the steel and auto docks.	

EPA Question	Response	Reference
	• On May 22, 1981, the City of Portland issued Conditional Use Permit 33-81 to Conqueror's Bible College and Chuck Holmes for the excavation and removal of approximately 33,000 cubic yards of material from TL 500 at the Upper Parcel. • On June 29, 1987, the City of Portland issued Conditional Use Permit 72-87 to the Port to fill and place rip rap at the auto dock. **Tenants** • On February 22, 1999, the U.S. Army Corps of Engineers issued Permit No. 98-1465 to Foss Maritime and the Port for removal of deteriorated dolphins, wood walkway structure, and associated wood pilings and installation of new steel dolphins adjacent to the Lower Parcel. The permit expired on February 25, 2002. • In 2009, Foss Maritime submitted application #APP0042939 to DSL for removal of its dolphins. Foss was subsequently issued Removal Permit #42939 from DSL and the U.S. Army Corps of Engineers and removed the dolphins in September 2009. • The following permits were identified in association with Toyota's operations: o 1500-A Water Quality Permit. o Toyota Boiler/Pressure Vessel Permits: STX6301-80X, STX7229-78X, ST7227-78, STX7228-78X, STX6259-89X, ST7226-78, STX6252-89X, and STX6300-80X. o DOT/HAZMAT Certificate. o Fuel Vanport Permit (DEQ). o Commercial building Permit from the Bureau of Development. o Tank permit from the Fire Prevention Division and Discharge Authorization Request from BES. o Permit for UST Permanent Decommissioning for 7 USTs, dated February 5, 1991 and expiring March 5, 1991. o RCRA Waste Activity Permit. o NPDES 1200-Z permit o On March 19, 1991, the City of Portland verbally approved a Batch Discharge Permit to the storm sewer for EAI (on behalf of Toyota) to discharge the water contained in six 20,000-gallon USTs on the Upper Parcel. The permit also allowed for modification through an addendum for the water from UST #1 to be discharged following carbon filtration. It does not appear that option was utilized.	
53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.	To the Port's knowledge, the Port has not filed a hazardous waste activity notification under RCRA for the T4 ASA property. It is the Port's understanding that the Toyota facility is currently and has historically been a small quantity generator since at least 1976. The notification for termination for the Upper Parcel was submitted by Toyota on January 7, 2005 for RCRA Site ID #ORD081971798.	See property transaction records at Tab 5.

EPA Question	Response	Reference
54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.	No.	
55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.	To the Port's knowledge, the only RCRA Identification Number for the T4 ASA property is assigned to Toyota (ID #ORD081971798).	See property transaction records at Tab 5.
56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.	Not applicable.	
57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.	Not applicable.	
58. List all federal and state environmental laws and regulations under which Respondent has reported federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.	**Federal** • Toxic Substances Control Act (TSCA) • Resource Conservation and Recovery Act, SARA 312 (State Fire Marshal) • Clean Air Act **State** • NPDES DEQ Municipal Separate Storm Sewer System (MS4) Discharge Permit No. 101314 and general NPDES permits (1200-Z and 1500-A). • Hazardous Substance Remedial Action Rules, Division 122 (OAR 340-122-010 through 0590) • Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459 • Air contaminant discharge permits administered by DEQ	See site investigation records at Tab 6. See other environmental records at Tab 7.
59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.	See records at Tab 7.	See other environmental records at Tab 7.

EPA Question	Response	Reference
60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.	Not to the Port's knowledge.	
61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.	Not applicable.	
Section 6.0 - Releases and Remediation		
62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify and provide copies of any document regarding: a. when such releases occurred; b. how the releases occurred (e.g. when the substances were being delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units). and treated); c. the amount of each hazardous substances, pollutants, or contaminants so released; d. where such releases occurred; e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release; f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken; g. all persons with information relating to these releases; and h. list all local, state, or federal departments or agencies notified of the release, if applicable; i. include a description of a sulfuric acid spill in May	The following leaks, spills or releases were identified at the ASA property: **<u>Lower Parcel</u>** • In late 1997, dust from the repair and paint blasting of vessels drifted onto the auto storage facility from the Mar Com shipyard facility located south of the Lower Parcel. Mar Com cleaned and removed the dust. • On February 1, 2006, one of Toyota's oil/water separators on the Lower Parcel that had reached its oil storage capacity overflowed during a heavy rain event. As a result, the oil bypassed the separator and drained oily sludge into one of the bioswales located at the Lower Parcel. The Port subsequently had the oil/water separator pumped out and approximately 500 gallons were removed. The volume released into the swale was estimated to be around two gallons. It was later determined the material was hydraulic oil that originated from one of Toyota's transport carriers. Toyota reimbursed the Port for the cleanout of the oil/water separator. • On July 7, 2007, approximately one gallon of antifreeze was released from the radiator of a vehicle operated by the Lines Bureau at Berth 415. The antifreeze was cleaned up by the operator of the vehicle and did not reach any storm drains. **<u>Upper Parcel</u>** • In 1984, a small hole was identified in UST #4 at the Toyota Auto Processing Center. The UST was used to store Van Fuel and was abandoned in place by filling the tank with sand. No further information was identified regarding the 1984 leak. • In 1986, a release of approximately 3,000 gallons of Van Fuel occurred at the Toyota Auto Processing Center. The release occurred when the abandoned in-place UST #4 was mistakenly filled with Van Fuel.	See property transaction records at Tab 5. See site investigation records at Tab 6. See other environmental records at Tab 7.

EPA Question	Response	Reference
1989 recorded by the Oregon State Fire Marshall's Office; and j. Specifically provide all information you have regarding spills, releases or waste disposal practices of Cargill, Inc. on any of your Properties.	• In March 1991, during the removal of six 20,000-gallon and one 10,000-gallon UST, impacted soil was observed. • In September 1995, free product was detected in a monitoring well to the northwest of the car wash USTs. See also response to Question 11, 22 and 71.	
63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify: a. where the disposal system or floor drains were located; b. when the disposal system or floor drains were installed; c. whether the disposal system or floor drains were connected to pipes; d. where such pipes were located and emptied; e. when such pipes were installed; f. how and when such pipes were replaced, or repaired; and g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.	Not to the Port's knowledge.	
64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding: a. amount of soil excavated; b. location of excavation presented on a map or aerial photograph; c. manner and place of disposal and/or storage of excavated soil; d. dates of soil excavation; e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent; f. reason for soil excavation; g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents; h. all analyses or tests and results of analyses of the soil that was removed from the Property;	The following excavations and removals were identified in association with the T4 ASA property. **<u>UST and Contaminated Soil Removal</u>** a. 828 cubic yards b. Former Toyota Auto Processing Center at the Upper Parcel c. Removed and transported to St. John's Landfill in Portland, Oregon d. 7/1 through 7/3/1986 e. Clearwater Construction Company and Mike Shough Trucking f. Identified during environmental audit for Toyota expansion. g. Oil h. Unknown i. Unknown j. Clearwater Construction Company, Bright & Associates, Port **<u>Contaminated Acid Auto Battery Soil</u>** a. 140 cubic yards b. Former St. Johns Wrecking Yard at Fuel Island #2, Upper Parcel (Former Toyota Auto Processing	See site investigation records at Tab 6. See other environmental records at Tab 7.

EPA Question	Response	Reference
i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and j. all persons, including contractors, with information about (a) through (i) of this request.	Center) c. Removed and transported to the St. Johns Landfill Portland, Oregon d. July 23, 1986 e. Clearwater Construction Company f. Identified during environmental audit for Toyota expansion. g. Acid from auto batteries h. pH analysis indicated the soil was acidic and required lime to neutralize the soil. i. Unknown j. Clearwater Construction Company, Bright & Associates, Port **<u>Gasoline Tanks 10 & 11 Leaks</u>** a. 3 cubic yards b. Former St. Johns Wrecking Yard at the Upper Parcel c. Removed and transported to the St. Johns Landfill in Portland, Oregon d. 1987 e. B&J Excavating f. Identified during integrity testing of UST piping systems. g. Van Fuel (similar to kerosene) h. None i. None j. B&J Excavating, Bright & Associates, Toyota Motor Sales, Port **<u>Abandoned Tank Contaminated Sand</u>** a. Unknown b. Former Toyota Auto Processing Center at the Upper Parcel c. Unknown d. February 22 through 25, 1988 (excavated) e. PowerMaster, Inc. f. Filling of abandoned tank g. Van Fuel h. Unknown i. Unknown j. Bright & Associates, PowerMaster, Inc., Toyota Motor Sales, Port **<u>Toyota Expansion Soil Excavation</u>** a. 45 cubic yards b. Area of the Phase II Toyota Expansion project at the Upper Parcel (adjacent to the Last Chance Wrecking Yard) c. Hillsboro Landfill in Hillsboro, Oregon for disposal. d. June 11, 1991 e. Unknown f. A soil investigation of the area conducted on March 19, 1991 concluded the soil was contaminated with used oil.	

EPA Question	Response	Reference
	g. Petroleum hydrocarbons h. Samples were analyzed for TPH by EPA Method 418.1, PCBs by EPA Method 8080 and for cadmium, chromium and lead on a total metal basis by EPA Method 3050. The analytical results indicate that only two composite samples showed evidence of petroleum contamination above DEQ cleanup standards. i. Six soil samples were collected following the excavation and submitted for TPH analysis by EPA Method 418.1. The results indicated that the levels of petroleum contamination which remained on the subject property ranged from non-detectable levels to 68 parts per million. Based on the analytical results, none of the samples exceeded applicable DEQ cleanup standards. j. Hahn & Associates, Rain Country, Inc., Port **<u>UST Excavations</u>** a. Unknown b. Former Toyota Auto Processing Center; location of former USTs 1 through 7. c. Backfilled into the excavations. d. March 25, 26, and 29, 1991 (excavated) Soil backfilled (June 12 and 20, 1991) e. Technical Action Group, Inc. f. Removal of USTs g. Solvent carwash effluent and Van Fuel h. TPH-HCID by modified EPA Method 8015 and TPH using DEQs Laboratory Method TPH-D test. i. TPH-HCID by modified EPA Method 8015 and TPH using DEQs Laboratory Method TPH-D test. j. Bright & Associates, Technical Action Group, Inc., Toyota Motor Sales, Port **<u>Toyota Redevelopment (2002)</u>** a. 30,000 cubic yards b. Toyota Auto Receiving Area at the Lower Parcel soil is from excavation along the river bank to reduce the slope for stability and greenscape purposes. c. The excavated soil was stockpiled east of Terminal 4 Slip 1 and is referred to as the East Stockpile. d. During construction of the Toyota Redevelopment Project in 2002 e. Turner Construction Company f. The soil was removed as part of the development of the Toyota Auto Receiving Yard in 2002 and was excavated from the river bank to flatten the slope for stability and greenscape purposes. g. Prior to construction, soil sampling from the area to be excavated was conducted. The samples were analyzed for TPH, PAHs, pesticides, PCBs, and metals. All results were below Department of Environmental Quality (DEQ) soil management screening levels (SLs). Metals were below detection limits or at or less than regional background levels. Petroleum hydrocarbons were not detected. In November 2006, the East Stockpile at T4 Slip 1 was randomly sampled and based on the historical data analyzed for TPH and PAHs. TPH was not detected. PAHs were detected at concentrations below criteria used by DEQ to determine if soil is suitable for use as clean fill. h. TPH by modified NWTPH-HCD or NWTPH-Dx, PAHs by EPA Method 8270-SIM, PCBs and organochlorine pesticides by EPA Method 8081A/8082, VOCs by EPA Method 8260B, and metals by EPA Method 6010A/6020/7470A/7471A (see February 14, 2007 memo regarding Soil Stockpile Sampling Results at Tab 7). i. See bullet (g) above	

EPA Question	Response	Reference
	j. Turner Construction Company, Port of Portland, Hart Crowser, Toyota **<u>Toyota Redevelopment (2002)</u>** a. 9,000 cubic yards b. Toyota Auto Receiving Area at the Lower Parcel c. The excavated soil was stockpiled east of Terminal 4 Slip 1 and is referred to as the West Stockpile. The stockpile is being managed as part of the Slip 1 RI. d. During construction of the Toyota Redevelopment Project in 2002 e. Turner Construction Company f. The soil was removed during construction of new automobile handling facilities on the southern portion of Terminal 4. Prior to construction of the facilities, the existing asphalt concrete was removed with an asphalt grinder. The asphalt grindings were recycled as base course on the construction site. Utility and footing excavations were completed through the base course material. During the excavation of facility buildings and utilities during wet weather, material found to be too wet for proper compaction was placed on the west side of the East Stockpile (described above), forming the West Stockpile. g. Prior to construction, soil sampling from the area to be excavated was conducted. The samples were analyzed for TPH, PAHs, pesticides, PCBs, VOCs, and metals. Except for TPH and PAHs, results were below detection limits or background concentrations. In November 2006, the west stockpile was randomly sampled and based on the historical data analyzed for TPH and PAHs. TPH and PAHs were detected with concentrations of benzo(a)pyrene above criteria used by DEQ to determine if soil is suitable for use as clean fill. The analytical results were consistent with the reported presence of asphalt grindings in the stockpile. h. See bullet (g) above i. See bullet (g) above j. Turner Construction Company, Port of Portland, Hart Crowser, Toyota Additional details on the stockpiles described above is included in the Port's T4 Slip 1 and Slip 3 104(e) response that was submitted to EPA on April 30, 2009.	
65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.	The groundwater under the Lower Parcel was tested during environmental investigations of the Toyota facility. The following groundwater investigation report is included in Tab 7: **<u>Lower Parcel</u>** • May 14, 2002 - Groundwater Investigation, Terminal 4 – Lower Willamette River, Auto Storage Facility, Portland, Oregon prepared by Hart Crowser. In addition, the Port has tested groundwater beneath the Lower Parcel in connection with investigations of the T4 Slip 3 Upland Facility. Details of those investigations are included in the Port's T4 Slip 1 and Slip 3 104(e) response that was submitted to EPA on April 30, 2009. See also the response to Question 13(h) above. The groundwater under the Upper Parcel was tested during Toyota's environmental investigations of its facility.	See site investigation records at Tab 6. See other environmental records at Tab 7.

EPA Question	Response	Reference
	The following ground water investigation reports are in included in Tab 7: **<u>Upper Parcel</u>** • October 15, 1993 - Groundwater Monitoring Report – July through September 1993 Toyota Motor Sales U.S.A. 10400 North Lombard Street Portland, Oregon prepared by EAI. • March 11, 1994 - Groundwater Monitoring Report – October through December Toyota Motor Sales U.S.A.10400 North Lombard Street Portland, Oregon project No. 250 03/11/1994 prepared by EAI. • May 12, 1994 - Groundwater Monitoring Report – January through March 1994 Toyota Motor Sales U.S.A.10400 North Lombard Street Portland, Oregon project No. 250 05/12/1994 prepared by EAI. • July 25, 1994 - Groundwater Monitoring Report – April through June 1994, Toyota Motor Sales U.S.A.10400 North Lombard Street Portland, Oregon project No. 250 05/12/1994 prepared by EAI. • March 17, 1989 - Quarterly Monitoring October through December 1988 for the Toyota Motor Sales Facility prepared by EAI. • June 8, 1989 - Quarterly Monitoring January through April 1989 Report for the Toyota Motor Sales Facility prepared by EAI. • September 11, 1989 - Quarterly Monitoring May through June 1989 Report for the Toyota Motor Sales Facility prepared by EAI. • March 15, 1990 - Quarterly Monitoring August 1989 through January 1990 Report No. 4 for the Toyota Motor Sales Facility prepared by EAI. • March 19, 1991 - Water sampling report for the Toyota Motor Sales Facility. • August 9, 1985 - Analysis of lysimeter and monitoring well data at TLS Facility, Portland, Oregon prepared by EAI. In addition, as described in response to Question 11 above, CHEMCENTRAL installed a monitoring well, MW-8, on the east side of the Upper Parcel in 2003 in connection with the remedial investigation of its facility. Groundwater monitoring was performed in April 2003 and April 2004. Analytical results from the April 2003 monitoring event indicate tetrachloroethene (PCE) was detected in MW-8 at 1.6 µg/L; however, results from follow-up sampling in April 2004 indicate chlorinated VOCs were non-detect. According to the RI report, relatively higher concentrations of chlorinated VOCs are present in groundwater beneath the CHEMCENTRAL building and the concentrations decrease going away from the structure. Since the PCE concentration in MW-8 was below applicable action levels, the RI concluded it did not pose unacceptable risk for the Upper Parcel. See also response to Questions 11, 13(h) and 71.	
66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding: a. reason for groundwater action; b. whether the groundwater contained hazardous substances, pollutants or contaminants, including	The Port has not treated, pumped, or taken any kind of response action on groundwater under the property. As described above, Toyota had an in-situ bioremediation treatment system and a separate VES system at the Upper Parcel to address impacted groundwater. The systems were in operation in various capacities from 1986 until deactivation in 1996. DEQ subsequently issued an NFA determination for the former TLS facility in September 2003 and the systems were subsequently removed in 2004.	See site investigation records at Tab 6.

EPA Question	Response	Reference
petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents; c. all analyses or tests and results of analyses of the groundwater; d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and e. all persons, including contractors, with information about (a) through (c) of this request.	See also response to Questions 13(g) and 71.	
67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unqualified "no", identify and provide copies of any documents regarding: a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged; b. the dates of each such occurrence; c. the amount and location of such release; d. were sheens on the river created by the release; e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.	See response to Question 22 above.	
68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s) or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.	Not applicable.	
69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.	Not applicable.	
Section 7.0 - Property Investigations		

EPA Question	Response	Reference
70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.	The Port has been having communications with its insurers regarding defense and settlement of third party claims associated with the Portland Harbor Superfund Site. The communications between the Port and its insurers are confidential communications in an ongoing insurance settlement process among the Port and its insurers and their respective legal counsel in respect of which the Port and its insurers have common interests adverse to third party governmental agencies and other potentially responsible parties in the Harbor (including associated upland sites) where there is actual or reasonable likelihood of future litigation. Such communications are attorney-client and work product privileged confidential communications under the common interest doctrine. As relates to the T4 ASA property, the factual information underpinning these confidential communications has, nonetheless, been disclosed in the documents and responses provided to these questions.	
71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property, Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.	The Port is a signatory to an Administrative Order on Consent for the Portland Harbor RI/FS. In addition, the Port entered into an Administrative Order on Consent for Removal Action with EPA in 2003 to address a specific in-water area off Terminal 4. These investigations are being conducted with EPA oversight and to the extent there are materials responsive to this question that are already in EPA's possession, they are not summarized below. **<u>Lower Parcel</u>** **Foundation Investigation, Proposed Wharf Development (Dames & Moore, 1970)** – In 1970, Dames and Moore completed exploration and sampling of soil borings at river and upland locations to evaluate area conditions and to provide an engineering analysis on liquefaction potential, construction problems, and make recommendations for dredging and filling in connection with the wharf development. Based on the evaluation, Dames & Moore recommended constructing a circular cell with one connecting arc bulkhead with independent support of the crane and deck by steel H-piling driven through the cell fills. **Predesign Study of Proposed Steel-Handling Wharf (CH2M Hill, 1971)** – In 1972, CH2M Hill conducted an investigation of the soils in the area of the proposed wharf. Recommendations from the investigation are detailed in the 1972 report *Predesign Study of Proposed Steel-Handling Wharf and Storage Area at Terminal No. 4.* and indicate that the construction of a wharf of the type designed and an adjacent storage area were feasible in the location selected at the Lower Parcel. **Additional Foundation Investigation (CH2M Hill, 1972)** – In August 1972, CH2M Hill completed seven additional borings following the relocation and extension upstream of the Steel-Handling Wharf from the original proposed location. No changes were encountered in the additional borings that required any design changes. An additional 24 borings from October 19 through 25, 1973 were completed to investigate the silt layers in the project area. **Terminal No. 4 – Slope Construction and Protection, 1972** – In 1972, five river bottom samples were collected from the proposed dredge borrow area in connection with Corps Permit 071-OYA-1-000645. Four of the samples were submitted for chemical analysis of volatile solids, chemical oxygen demand (COD), total Kjeldahl nitrogen (TKN), oil and grease, mercury, lead, and zinc. Results indicate volatile solids (wet) ranged from 1.97 to 6.12%, volatile solids (dry) from 1.56 to 5.59%, COD (wet) from 0.24 to 4.36%, COD (dry) from	See property transaction records at Tab 5. See site investigation records at Tab 6. See other environmental records at Tab 7.

EPA Question	Response	Reference
	1.56 to 5.59%, and TKN ranged from 0.02 to 0.11%. Oil and grease was reported as NIL and the only metal detected was lead at 0.001%. **Marine Terminals Rehabilitation Preliminary Engineering Geotechnical Considerations (Foundation Sciences Inc., 1981)** – In 1981, Foundation Sciences, Inc. reviewed subsurface soils data to preliminarily evaluate subsurface conditions prior to planning rehabilitation of Terminal 4. The review recommended any soft basin silts excavated from the wharf extension area be removed from the construction site and that cells should be filled with clean granular material. **Sampling of Liberty Ship Tanks at Terminal 4 Auto Dock (Berth 416) (Hahn & Associates, Inc., 1989)** – On October 10 and 26, and November 16, 1989, 19 samples were collected from sampling ports located on the former liberty ship (which has been converted to an auto dock (Berth 416)). The samples were collected to characterize the materials so the dock could be deballasted. Analytical results showed four of the tanks contained bunker fuel, twelve of the tanks contained water, two of the tanks contained an oil/water mixture, and one tank appeared to contain diesel. Based on the results, the Port subsequently requested to discharge the water to the City's sanitary sewer. **Terminal 4 Auto Dock Ballast Tank Sampling (Hahn & Associates, 1990)** – On January 18, 1990, two water samples were collected at the western ballast tank at the Auto Dock facility at Berth 416. The samples were analyzed for PCBs, solvents by Modified EPA Method 3810, and total metals per EPA Methods 3005 and 7000 series. Analytical results for Sample 2-Waste Oil Tank revealed trace concentrations of cadmium and lead, and 1,1,1-trichloroethane, PCE, toluene, ethyl benzene, xylenes, and acetone. No additional information was available. **Geotechnical Investigation, Proposed Warehouse, Terminal 4-Berth 414/415 (Dames & Moore, 1990)** – In 1990, Dames & Moore conducted a geotechnical investigation to evaluate the physical characteristics of soil in the area of the proposed warehouse and make recommendations for foundation support. Based on their evaluation, Dames & Moore recommended the design proceed as planned using conventional shallow foundation support and normal construction techniques. **Sediment Characterization Study Berth 416, Volume I (Hart Crowser, 1998)** – Chemical testing in 1997 identified that the proposed dredged material at Berth 416 contained elevated concentrations of total DDT above the screening levels established for the Lower Columbia River Management Area (LCRMA). Chemical and Tier III biological testing was performed in 1998, following the protocols established in the LCRMA Dredged Material Evaluation Framework to complete the evaluation of the proposed dredge material. The results of the chemical analyses confirmed the presence of total DDT and yielded results indicating that the concentration of total DDT exceeded the maximum level established in the LCRMA. Tier III biological testing was conducted in 1998 and demonstrated that this material does not pose an unacceptable risk to aquatic organisms based on acute or chronic toxicity. However, the analytical results from 1998 revealed that total DDT concentrations exceeded the LCRMA Bioaccumulation Trigger, which indicates that additional bioaccumulation testing of the proposed dredged material would be required to continue evaluating unconfined in-water disposal options. Because of the exceedances, Tier III biological testing was	

EPA Question	Response	Reference
	recommended. The Tier III testing indicated that the material did not pose an unacceptable risk to aquatic organisms based on acute or chronic toxicity. **Baseline Environmental Site Assessment - Phase I and Phase II Investigation (Hart Crowser, 2002)** – In April and May 2001, 33 push probes were completed on the Lower Parcel. Soil samples were analyzed for TPH, VOCs, PAHs, SVOCs, PCBs, organochlorine pesticides, and metals. Groundwater samples collected during boring activities were analyzed for PAHs, VOCs, metals, and butyltins. In summary, petroleum hydrocarbons (as diesel and oil) were detected in a 1.5-foot soil layer in GP-4 at about 13 feet below the ground surface (bgs), low concentrations of PAHs were detected at scattered locations in soil and groundwater across Toyota Receiving Yard, and metals results were generally consistent with typical background concentrations. With one or two exceptions, SVOCs, PCBs, pesticides, and butyltins were not detected. **Geotechnical Investigations (GRI, 2002)** – On behalf of MNB Architects/Engineers, GRI conducted a geotechnical investigation on December 5 and 6, 2002 to evaluate subsurface conditions at the site and develop conditions and recommendations regarding earthwork and foundation support. The investigation consisted of a review of available geotechnical information for the area, additional subsurface explorations, laboratory testing, and engineering studies and analyses. The subsurface explorations indicate the site is mantled by sand fill that is underlain by alluvial floodplain deposits consisting of interbedded silt and sand. Results of the investigations indicate the proposed structures can be supported on spread footing foundations established in the sand fill. During installation of two soil borings (B-2 and B-4), creosote-like odors were reported at depths between 10 and 20 feet below grade. Removal of TPH-impacted soil is described in response to Question 64 above. The geotechnical investigations are summarized in several reports and are contained in Appendix F of the 2002 Hart Crowser Groundwater Investigation report described below. **Geotechnical Investigations (GRI, 2002)** – On behalf of HDR Engineering, GRI conducted a geotechnical investigation to evaluate subsurface conditions and provide recommendations for the renovation of Toyota's facility. A total of 12 borings were completed on May 2 and 3, 2001 and June 13, 2001. Results indicate that the area was mantled by dredge sand fill that is underlain by alluvial floodplain deposits. Based on the investigation, GRI recommended stripping the area of all organic material, using on-site or imported fine-grained sands for structural fill, cutting and filling slopes to prevent erosion during excavation, shoring during excavation and installation of utilities, and specified thickness of asphalt cover. **Riverbank Stabilization and Enhancement Project (Bridgewater Group, 2002)** – DEQ required the Port demonstrate that soils exposed by the riverbank stabilization and enhancement project did not contain unacceptable levels of soil contamination. To address this concern, a subsurface soil investigation was performed that included collecting and analyzing soil samples from three soil borings placed along the proposed cut for the future riverbank. In summary, no PCBs or pesticides were detected; metals in soils were below or comparable to baseline concentrations in Portland Harbor sediments; and PAH concentrations in exposed soils across the entire portion of the riverbank were, overall, less than the DEQ's ecological screening level values. Finally, the potential for exposed riverbank soils to erode to the river would be limited by the use of silt fences during construction and planting native vegetation after construction. **Groundwater Investigation (Hart Crowser, 2002)** – In March 2002, four groundwater monitoring wells	

EPA Question	Response	Reference
	(MW-1 through MW-4) were installed to evaluate PAHs in groundwater following the results of Phase II activities performed at the Lower Parcel. Soil samples were collected during the installation of the wells and groundwater samples following well development. Soil samples were analyzed for TPH and groundwater samples were analyzed for PAHs. Diesel- and oil-range hydrocarbons were not detected in the soil sample. Five PAH compounds were detected at very low concentrations and below their associated SLVs in the groundwater sample from AW-2, with the exception of benzo(a)anthracene. Groundwater sampling results indicate that the site does not appear to pose an ecological concern to the Willamette River. **Predevelopment Investigation (Hart Crowser, 2003)** – The purpose of the investigation was to evaluate possible contamination near two geotechnical borings previously installed by GRI in the area of a proposed new building for Toyota. On February 26 and 27, 2003, 16 borings were completed and soil and groundwater samples were collected. A total of 18 soil samples and three groundwater samples were analyzed for TPH-HCID and for PAHs. One soil sample and one groundwater sample were also analyzed for TPH as diesel and oil. Low concentrations of TPH and PAHs were detected in the soil near former geotechnical boring B-2 and in groundwater samples collected from three of the push-probe locations. The results indicate that the analytical results from soil samples collected during this investigation are consistent with results obtained during Hart Crowser's 2002 Baseline Assessment and the low concentrations of PAHs are within acceptable risk levels for applicable exposure pathways. Removal of soil with PAH concentrations is described in response to Question 64 above. **Upper Parcel** **Soils Investigation for Grading, Paving and Utilities (Shannon & Wilson Inc., 1976)** – Subsurface investigation conducted in 1976 for the purpose of delineating design parameters for the grading and utility construction at the proposed new facility. Subsurface explorations at the proposed site revealed relatively uniform soil conditions. Investigation recommended excavation of topsoils, sandy soils on property will make adequate fill material (with possible drying), and determined rate of settlement of fill will be rapid. **Environmental Investigation and Cleanup, St. John's Auto Wrecking Yard (Bright & Associates, 1986)** – In June 1986, Bright and Associates (B&A) was retained by Toyota to conduct an environmental investigation of the St. Johns Wrecking Yard. During the course of the investigation B&A observed oily water being discharged to the ground during steam cleaning operations at the facility. B&A also observed oil staining on the ground. Materials stored at the facility at the time of the investigation included drums of solvent, thinner, and gasoline. One waste oil UST was present and a second UST was suspected to be present near the waste oil UST. Following the investigation, B&A hired Dames and Moore to conduct sampling to evaluate subsurface conditions at the former wrecking yard, which included completion of 26 shallow soil borings and installation of two groundwater monitoring wells. Soil samples were analyzed for TPH, PCBs, metals, VOCs, and SVOCs. TPH was detected in three samples. All other results were below detection limits or were consistent with background concentrations. Groundwater samples were analyzed for metals, VOCs, and SVOCs. All results were below detection limits or were consistent with background concentrations.	

EPA Question	Response	Reference
	Geotechnical Engineering Services (GeoEngineers, Inc., 1990) – In 1990, GeoEngineers conducted a subsurface investigation to provide geotechnical engineering recommendations for the design and construction of asphalt pavement at the Toyota automobile storage yard. Test pits, soil classification, moisture and density tests, CBR, and compaction tests were completed. Results of the investigation indicated that site conditions were satisfactory for the planned project. **Quarterly Monitoring Groundwater Monitoring** – On behalf of Toyota, EAI performed quarterly monitoring of the modified in-situ bioremediation treatment system, which included sampling and analysis of water from the system's groundwater extraction wells. The water samples were analyzed for Kjeldahl nitrogen, nitrate, and phosphorous concentration. Additionally, the water samples were tested for purgeable organics. Results are summarized below. • **October through December 1988 (EAI, 1989)** – On January 4, 1989 water samples were obtained from extraction wells W-3 and W-6. No concentrations of purgeable organics were detected in the water samples indicating that the vadose zone contaminants have not impacted the groundwater. Only minor concentrations of Kjeldahl nitrogen, nitrate, and phosphorous were detected in the water samples. Those concentrations were below EPA standards for drinking water. • **January through April 1989 (EAI, 1989)** – On April 19, 1989 water samples were obtained from extraction wells W-3 and W-6. The analytical testing results indicate that minor concentrations of Kjeldahl nitrogen, nitrate, and phosphorous were detected in the water samples. Additionally, trace concentrations of 1,2-dichloroethane, 1,1,1-trichloroethane, ethylbenzene, and o-xylene were detected in the sample obtained from well W-6 when analyzed for purgeable organics. Trace concentrations, however, were at or below U.S. EPA Drinking Water Standards. • **May through July 1989 (EAI, 1989)** – On June 14, July 6 and 24, 1989 water samples were obtained from extraction wells W-3 and W-6 and the injection stream which contained processed groundwater from the 565- and 883-gallon aboveground process tanks. The analytical results indicate that minor concentrations Kjeldahl nitrogen, nitrate, and phosphorous in the water samples from MW-3 and MW-6 and the processing tanks. Additionally, trace concentrations of 1,1-dichloroethene and 1,1,1-trichloroethane were detected in the sample obtained from well W-6 when analyzed for purgeable organics. Trace concentrations, however, were at or below U.S. EPA Drinking Water Standards. • **August 1989 through January 1990 (EAI, 1990)** – On August 10, 1989 water samples were obtained from extraction wells W-3 and W-6 and the injection stream which contained processed groundwater from the 565- and 883-gallon aboveground process tanks. The analytical results indicate non-detectable to minor concentrations of nitrogen, Kjeldahl nitrogen, and phosphorous were detected in the water samples from W-3 and W-6. Trace concentrations, however, were at or below U.S. EPA Drinking Water Standards. On January 16 through 17, 1990 three borings were drilled to assess the efficacy of the in-situ bioremediation treatment system. Soil samples were collected and analyzed for TPH, carbon chain analysis, and VOCs; results ranged from 1,240 to 32,760 ppm. Based on the analytical results, EAI requested approval from DEQ to discontinue use of the in-situ bioremediation system. The system was subsequently shut down in 1990. **January 1991 Water Sampling Report (EAI, 1991)** – Between January 28 and 30, 1991, water samples were obtained from three monitoring wells located at the Toyota Motor Sales, U.S.A., Inc. facility. The samples were	

EPA Question	Response	Reference
	analyzed to monitor groundwater quality beneath the site after cessation of remediation activity. Water samples were collected from W-3, W-4 and W-6 and analyzed for VOCs. No VOCs were detected above the minimum detection limits used in the analysis. Based on the results, the system was dismantled between January 28 and February 1, 1991. Equipment related to the system was dismantled and removed, injection wells were grouted in place, and the trenches were repaved with asphalt. **Surface Soil Sampling (Hahn, 1991)** – In March 1991, surface soil sampling was performed in the area of a footpath and drainage-way shared with the Last Chance Wrecking Yard to the north (current location of metals recycler). Samples were analyzed for TPH, PCBs, and metals. Results indicate detections up to 620 mg/kg TPH, 0.7 mg/kg PCBs, and 480 mg/kg lead in the samples. In June 1991, about 45 cy of the contaminated soil was removed from an excavation area about 10 feet wide by 40 feet long (east-west). The excavation was approximately 3 feet deep at its north side and tapered upward to the ground surface on the south. Six verification samples were collected and analyzed for TPH, with a maximum result of 68 mg/kg. **Car Wash UST Release, Assessment, and Remediation (EAI)** – In 1984, a leak was detected in a 10,000-gallon Van Fuel UST. The UST was subsequently abandoned in place with sand. Between 1988 and 1990, however, the UST was mistakenly filled with Van Fuel, resulting in an estimated 3,000- gallon release. In 1991, Toyota had this UST and the other six car wash USTs decommissioned by removal. Based on the releases, Toyota retained environmental consultants to complete investigation and remediation activities which consisted of the following: • In 1984 and 1985, Dames and Moore installed five groundwater monitoring wells (W-1A through W-5) and five lysimeters (for water percolation testing) to assess the 1984 release (EAI, 2001). • In 1986, B&A implemented a bioaugmentation system, consisting of injection of bacteria (specially formulated to degrade Van Fuel type contaminants), hydrogen peroxide, and nutrients (EAI, 1989). • In 1987, eight soil borings were completed to assess the efficacy of the in-situ bioremediation treatment system and to determine if additional contaminant migration had occurred in the vadose zone that might have been caused by the in-situ bioremediation treatment process. Based on the results, modifications to the treatment system were proposed. • In 1990, following modifications and quarterly groundwater monitoring (described above), operation of the in-situ bioremediation system was terminated (EAI, 2002). • Between 1986 and 1990, B&A and EAI completed 35 soil borings and installed one monitoring well (W-6), in the area of the car wash USTs to delineate the extent of contamination (EAI, 1997a). • In January 1993, EAI implemented a vapor extraction system (VES). • In late 1993, EAI started a comprehensive groundwater monitoring program that included analysis for VOCs and PAHs. One year of quarterly monitoring was performed, after which monitoring was performed on a semi-annual basis (as approved by the DEQ; EAI, 2001). • In September 1994, up to 1/4 inch of free product was detected in a monitoring well to the northwest of the car wash USTs (W-2). This well was hooked up to the vapor extraction system in late 1995. The well was disconnected from the system in March 1996. • In 1995, Exploration Technologies, Inc. (ETI) completed 14 soil borings to evaluate the effectiveness of the VES. The results of this investigation indicated that VOCs had been removed, although heavy-end	

EPA Question	Response	Reference
	(long-chained) hydrocarbons remained (EAI, 2001). • In 1996, EAI conducted a supplemental subsurface investigation that included completing five soil borings and installing three groundwater monitoring wells (W-7 through W-9; EAI, 1997a). After monitoring these new wells and existing wells, the monitoring program was suspended. Based on the above data, EAI concluded that there were no risks of exposure to site contaminants as contamination was at depths below 15 feet, VOCs were below Tier 1 screening levels (regulatory levels applicable at that time), and groundwater was not being used in the site vicinity. EAI also concluded that PAHs in groundwater did not originate from the Van Fuel release because the PAHs were not detected in the contaminated soil. DEQ, however, determined additional work would be required to better delineate the extent and nature of soil and groundwater contamination and to establish the groundwater gradient (DEQ, 2000). **Quarterly Groundwater Monitoring (EAI)** - On behalf of Toyota, EAI conducted a comprehensive groundwater monitoring program following observation of free-product in well W-2 and the installation of the VES system. The monitoring consisted of gauging six wells and analytical testing of the obtained water samples. Samples were analyzed for total recoverable petroleum hydrocarbons (TRPH), total petroleum hydrocarbons-hydrocarbon identification (TPH-HCID), VOCs, and PAHs. • **July through September 1993 (EAI, 1993)** - Sampling was conducted on September 9 and 10, 1993. Dissolved TRPH was detected in samples from wells W-2, W-4, and W-6. In the water sample from W-2, the TPH-HCID testing indicated that TPH (identified as kerosene) was detected. No VOCs were detected in the water samples. • **October through December 1993 (EAI, 1994)** – Sampling was conducted on December 27 and 28, 1993. Dissolved TRPH was detected in the six site wells. No petroleum hydrocarbons as kerosene were detected using the TPH-HCID testing procedures. Chloroform and 1,1,1-trichloroethene, were detected in wells W-2 and W-4, respectively. Naphthalene was detected in wells W-1A and W-6, phenanthrene was detected in well W-2, and several PAHs were detected in samples from monitoring wells W-3, W-4, and W-5. • **January through March 1994 (EAI, 1994)** – Sampling was conducted on March 28 and 29, 1994. Dissolved TRPH was detected in the six site wells. The water sample from W-2 contained detectable concentrations of petroleum hydrocarbons as kerosene. 1,1,1-trichloroethane was detected in the site wells. The samples from wells W-2 and W-3 also contained 1,1,1-trichloroethene. Monitoring well W-5 contained benzo(a)anthracene and chrysene. Concentrations were lower than those observed during the third quarter 1993. • **April through June 1994 (EAI, 1994)** – Sampling was conducted on June 21 and 22, 1994. Dissolved TRPH and TPH-HCID were detected in the sample from W-2. Monitoring wells W-4 and W-5 contained PAHs slightly above the DEQ UST Cleanup Manual action levels. These concentrations are similar to or lower than those observed during the first quarter 1994. **Car Wash UST Release – Additional Investigation** – In May and June 2002, nine soil borings were completed in the former car wash area and three groundwater monitoring wells were installed. Groundwater monitoring of all facility wells, including wells installed as part of the St. Johns Wrecking Yard assessment, was	

EPA Question	Response	Reference
	performed in June and September 2002. Based on the analytical results, it was concluded that no unacceptable risks were posed (EAI, 2002). In September 2003, DEQ concurred and issued an NFA determination for the former Van Fuel, gasoline, and waste oil USTs for the TLS Facility (DEQ, 2003a). **Soil Sampling – Wrecking Yard Area (Hahn and Associates Inc., 1991)** – On March 19, 1991, soils samples were obtained from the surface and the near surface along the property boundary with the Last Chance Auto Wrecking property. Samples were analyzed for TPH, PCBs and for cadmium, chromium and lead on a total metal basis. The analytical results indicate only composite samples showed evidence of petroleum contamination above DEQ cleanup standards. **Report on Removal of Two 10,000-Gallon Gasoline Underground Storage Tanks (EAI, 2004)** – In November 2004, the two USTs were decommissioned at the Upper Parcel. Eleven soil samples were obtained from beneath the USTs, the associated dispensers, and product lines and submitted for analysis of TPH-HCID. Analytical testing results for all 11 soil samples were below laboratory detection limits. Based on the analytical results, no additional action was warranted. **Car Wash and Associated Facilities Demolition (EAI, 2005)** – EAI was retained by Toyota to remove a car wash trench, two clarifiers, a wash pad, and two hydraulic hoists formerly associated with the car wash and maintenance building. EAI also removed and disposed of a 4,000-gallon AST and Baker Furnace oxidizer that were associated with soil remediation work previously conducted at the site. On December 12, 2004, when EAI arrived on site, however, the car wash and maintenance building had already been removed. Soil at the base of each excavation was examined. There was no evidence of odor, staining, or discoloration at any location. Soil samples were obtained from beneath the trench, the clarifiers, the hoists, and the wash pad. At the direction of Toyota, additional samples were obtained from beneath the AST and a former oil/water separator. Soil samples were also obtained from beneath the floor in a paint room and compressor room located in an adjacent building. Analytical testing results of all soil samples were below the detection limits for diesel and heavy oil range hydrocarbons. **North Landscaped Area – Metals Data (Hart Crowser, 2006)** – In December 2004, as part of a lease exit audit for Toyota, two soil samples were collected from a 2-foot-wide strip of barren soil along the property boundary shared with the adjacent metals recycler. The strip forms a drainage ravine along the western portions of the recycler's fence line. The soil samples were analyzed for metals, TPH, and PCBs. Results indicated that several metals were elevated when compared to typical background concentrations. Additionally, low concentrations of PCBs (Aroclor 1260) were detected in both samples, and diesel- and oil-range hydrocarbons were detected at low concentrations in one sample. Based on the results, three subsequent sampling events were conducted to assess the vertical and lateral distribution of metals in the soil adjacent to the recycler's fence, including: • On August 3 and 12, 2005, a total of 21 hand-augered borings were completed in the landscaped area. Soil samples were collected from each boring. Visible metal debris was present in eight borings to a maximum depth of 20 inches below ground surface. To assess metals concentrations in soil below and adjacent to areas of visible debris, soil samples from 10 borings were submitted for analysis for arsenic, chromium, lead, and zinc. Because detected lead concentrations from some samples could potentially	

EPA Question	Response	Reference
	fail for the toxicity characteristic, two of the samples were selected for analysis for leachable lead. Analytical results indicated leachable lead was not detected above the method reporting limits. Based on the results, arsenic and lead were identified as the primary metals of interest. • On October 3, 2005 five additional samples were collected from hand-augured borings to delineate the extent of metals in soil. The sampling included collection of three samples from other (not suspected to be impacted) areas of the former Toyota Processing Yard to establish background concentrations of lead and arsenic at the site. The lead and arsenic concentrations in four of the five samples were above background concentrations suggesting that local background is at or slightly above published values. The results of assessment activities at the site indicate visible metal debris is present in shallow soils immediately adjacent to the metals recycler's fence. The debris appears to be located in three distinct areas and varies from 4 to 20 inches in thickness. Elevated concentrations of arsenic, lead, chromium, and zinc in soil indicate a portion of the site, immediately adjacent to the metals recycler, has been impacted. No additional information was available.	
72. Describe any remediations or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk: evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.	See response to Questions 13(g), 13(j), 64, 66, 70 and 71 for information on remediation and response actions conducted at the T4 ASA property.	
73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, and hydrology or air quality on or about the Property? If so, identify: a. what the nature and scope: of these investigations will be; b. the contractors or other persons that will undertake these investigations; c. the purpose of the investigations; d. the dates when such investigations will take place and be completed; and e. where on the Property such investigations will take place.	No.	
Section 8.0 - Corporate Information		
74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:	See response to bullets (a) through (e) below.	

EPA Question	Response	Reference
a. state the current legal ownership structure (e.g.. corporation, sole proprietorship);	The Port of Portland was created by the Oregon legislature in 1891. Oregon Revised Statutes 777 and 778 contain the authority of the Port of Portland. It is a state Port District for an area encompassing all of Multnomah, Clackamas and Washington Counties. The Port is governed by a nine person commission appointed by the Governor of Oregon and confirmed by the State Senate.	See ORS 777 and 778 information in Tab 8 of the Port's 104(e) response for Willamette Cove, submitted to EPA and dated June 18, 2008.
b. state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors;	Port of Portland 121 NW Everett Portland, OR 97209	
c. discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and he names of all parties involved;	Not applicable.	
d. the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and	Not applicable.	
e. if your- business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.	Not applicable.	
75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:	Port of Portland Registered Trademark Name - Rivergate Industrial District	
a. whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;	Yes, the Port of Portland is extant.	
b. names, addresses, and telephone numbers of all registered agents, officers and operations management personnel; and	Registered Agent: Carla L. Kelley General Counsel Port of Portland 121 NW Everett Street Portland, OR 97209 503-944-7031	

EPA Question	Response	Reference
	President, Port Commission Judith A. Johansen Marylhurst University 17600 Pacific Highway (Hwy 43) P.O. Box 261 Marylhurst, OR 97036 503-699-6266 Vice President, Port Commission Mary F. Olson Norris, Olson & Associates, Inc. 7105 SE 19th Ave. Portland OR 97202 503-235-2425 Treasurer, Port Commission William D. Thorndike, Jr Medford Fabrication PO Box 1588 1109 Court Street Medford OR 97501 541-770-1172 Secretary, Port Commission Steven H. Corey Corey, Byler, Rew, Lorenzen & Hojem PO Box 218 Pendleton OR 97801	
c. names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.	Not applicable.	
76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.	Oregon Revised Statutes 777 and 778.	See ORS 777 and 778 information in Tab 8 of the Port's 104(e) response for Willamette Cove, submitted to EPA and dated June 18, 2008.
77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:	Not applicable.	

EPA Question	Response	Reference
a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;	Not applicable.	
b. the dates such relationship existed;	Not applicable.	
c. the percentage of ownership of Respondent that is held by such other entity(ies);	Not applicable.	
d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;	Not applicable.	
e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and	Not applicable.	
f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.	Not applicable.	
78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.	Not applicable.	
Section 9.0 - Compliance With This Request		
79. Describe all sources reviewed or consulted in responding to this request, including, but not limited to:	Records reviewed for this request include the following Port departments: Marine and Industrial Development (MID) Environmental Affairs Legal Research Engineering	
a. the name and current job title of all individuals consulted;	Sara Moore (Environmental Project Manager), Suzanne Barthelmess (Claims Manager), Sheila David (Environmental Analyst), Lorali Sinnen (MID Development Project Manager), David Breen (Environmental	

EPA Question	Response	Reference
	Project Manager), Jeff Krug (Terminal Manager), Sabrina Rowlette (Environmental Technician), Jenifer Fonseca-Littrell (Environmental Specialist), and Mike Jeletic (Environmental Technician).	
b. the location where all sources reviewed are currently reside; and	Port of Portland offices and records storage.	
c. the date consulted.	July-October 2009	
80. If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous materials at, or transportation of hazardous substances, waste, or materials to or from each Property identified in response to Question 4.	Not applicable.	
81. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following;	Records Review and Destruction Notices were reviewed to determine if any relevant records were destroyed pertaining to the T4 ASA property. Consistent with public-recordkeeping requirements, the Records Review and Destruction Notices are maintained at the Port of Portland Administrative office. The Destruction Notices contain standard information including the former archive box number, originating department, and date of destruction. Limited information is provided on the contents of the files formerly contained within the boxes; records are described generally, using categories such as "miscellaneous correspondence," "chronological files," "memos," etc. While some provide a reference to a property to which the records may have pertained, it is so general that there is no way to determine with any certainty the nature or content of the documents that were destroyed.	
a. the document retention policy between 1937 and the present;	The Port is required by law to retain all "public records" for at least the period of time specified in a retention schedule approved by the State Archivist. The Port of Portland Records Retention and Disposition Schedule is the approved retention schedule for the Port of Portland. "Public records" include documents, books, papers, photographs, files, sound recordings, or machine-readable electronic records, regardless of physical form or characteristics, which are made, received, filed, or recorded by the Port in connection with the transaction of Port business. Employees must adhere to records retention and destruction procedures established by the Port's records manager in accordance with State statutes and the Port of Portland Records Retention and Disposition Schedule. The Port's retention and disposition schedules were suspended for records relevant to Portland Harbor when the Port received notice of Portland Harbor's listing on the National Priority List in December 2000.	See records management information at Tab 8 of the Port's 104(e) response for Terminal 1 North, submitted to EPA and dated July 18, 2008, specifically: • Ordinance 142 • Ordinance 149 • Ordinance 196 • 2001 Records Retention Schedule • 2001 Records Retention with 2003 Revision • 2008 Records Retention Schedule
b. the approximate date of destruction;	At this time, no potentially relevant Port documents related to the T4 ASA property have been identified as destroyed.	

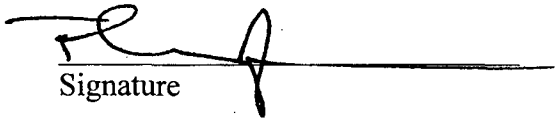
EPA Question	Response	Reference
c. a description of the type of information that would have been contained in the documents;	Not applicable	
d. the name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; the person(s) who would have been responsible for destroying the documents; and the person(s) who had and/or still have the originals or copies of these documents; and	Michael Wells Records Manager Port of Portland 121 NW Everett Street Portland, OR 97209	
e. the names and most current addresses of any person(s) who may possess documents relevant to this inquiry.	None known.	
82. Provide a description of all records available to you that relate to all of the questions in this request, but which have not been included in your responses.	The Port is in litigation with potentially responsible parties (PRPs) over the Portland Harbor Superfund Site and also believes that it is reasonably likely that it will be in litigation with other PRPs and others over the responsibility for contamination in the Portland Harbor Superfund Site adjacent to the T4 ASA property. Work product in anticipation of litigation and written communications in order for the Port to obtain legal advice relating to the environmental liability issues associated with the Superfund Site, including attorney-client and work product communications, are not disclosed as part of this submission; however, no underlying facts referenced in such confidential communications that are responsive to these questions have been withheld on these confidentiality grounds. See also response to Question 70.	

DECLARATION

The Port is unaware of any legal basis for the Declaration required by the Instructions to this Information Request. Neither 42 USC 9604(e) nor 18 USC 1001 require a respondent to swear under penalty of perjury that a response to a CERCLA 104(e) information request is "complete, true and correct." The Port has responded to EPA's request as accurately and completely as possible based upon a review of available Port records and other information available upon reasonable inquiry concerning the decades of activity at issue in the request. Given the time span and breadth of the request, documents have certainly been lost or destroyed, people involved in the activities have left the Port or died, and memories have faded. The Port has provided the best information available. As noted by EPA, the Port may supplement its response if additional information becomes available or known to the Port after submission of this response. Having completed this response to the best of the Port's knowledge, information and belief formed after reasonable and good faith inquiry within the imposed time constraints, and based upon our understanding that a response that does not include a signed declaration in the form included in the request will be considered incomplete and subject the respondent to civil or criminal penalties, the Port makes the following declaration:

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the attached response for the Terminal 4 Auto Storage Area Property is complete, true, and correct.

Executed on October 14, 2009



Signature

Tom Imeson
Print Name

Public Affairs Director
Title

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